

between the Applicant and its competitors. In making **our** assessment, we **look** for patterns of systemic performance disparities that have resulted in competitive harm or that have otherwise denied new entrants a meaningful opportunity to compete.” Isolated cases of performance disparity, especially when **the** margin of disparity is small, generally will not result in a finding of checklist **noncompliance**.¹⁴⁶

51. In applying this analysis to the instant record, we find that, in the few instances where there were disparities in Nevada Bell’s performance measures.” Nevada **Bell’s** order volumes with respect to certain categories of loops, or order volumes with respect to a specific metric for a certain category of loop, may be too low to provide meaningful data for our **analysis**.¹⁴⁸ As discussed above,” where we have no meaningful data reflecting Nevada Bell’s performance, we examine the performance of its affiliate, Pacific Bell, in California.

52. **Voice-Grade Loops.** We conclude, as did the Nevada **Commission**,¹⁵⁰ that the Applicant demonstrates that it provides nondiscriminatory access to voice-grade loops. Given the low number of orders in Nevada, we examine Pacific **Bell’s** performance in California.

53. Pacific Bell experienced performance disparities for Frequency of Repeat Troubles within 30 Days for voice-grade loops in three of the five months at issue in this proceeding.” This metric measures the percentage of customers that report line troubles within 30 days of a prior trouble report.

54. However, the performance disparities are minor, and Pacific **Bell** met parity in January. Moreover, even Pacific Bell’s retail affiliate’s customers continue **to** experience a large number of repeat troubles.¹⁵² In addition, in instances where competitive LECs have submitted trouble reports, Pacific Bell has achieved parity in the measure Average Time to Restore in all

¹⁴⁵ See *Verizon Massachusetts Order*, 16 FCC Rcd at 9055-56, para. 122.

¹⁴⁶ See *Verizon Massachusetts Order*, 16 FCC Rcd at 9055-56, para. 122.

¹⁴⁷ See Appendix B.

¹⁴⁸ A small handful of observations may cause seemingly large variations in performance measures. See *Verizon Massachusetts Order*, 16 FCC Rcd at 8988, para. 93 n.296.

¹⁴⁹ See discussion in **Section III.C.2.a** above.

¹⁵⁰ See *Nevada Commission Order* at 139-143.

¹⁵¹ See PM 23-2392601 (**CA** Frequency of Repeat Troubles within 30 days). The comparable percentages of repeat troubles were 8.39, 9.17, **8.80**, 10.19 and 9.76 for competitive LECs and 7.15, 7.47, 7.10, 8.76, and 9.27 for Pacific Bell’s retail affiliate in September, October, November, December, and January respectively. Pacific Bell failed to meet parity for this metric in October, November, and December.

¹⁵² For the period of September through January, the disparity between Pacific Bell’s performance for the competitive LECs and for Pacific Bell’s retail affiliate was 1.34%. See Appendix C: Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at **6:compare Pacific Bell California Order**, 17 FCC Rcd at 25721, para. 127 n.459 (noting the minor discrepancy of 1.95% in Pacific Bell’s performance on this performance measure in August 2002).

but one month from September 2002 to January 2003, and in that one month where parity was not met, the disparity was only 0.17 hours.¹⁵³ Finally, we note that Pacific Bell has committed to taking concrete steps to improve its performance on this metric.”¹⁵⁴ According to the Applicant, since implementing these steps, “Pacific Bell has seen a reduction in repeat trouble reports on basic UNE loops of over 20%.”¹⁵⁵ Thus, as in the California section 271 proceeding, we find that these performance disparities do not warrant a finding of checklist noncompliance.

55. **High-Capacity Loops** Based on the evidence in this record, we find, as did the Nevada Commission, that Nevada Bell provides non-discriminatory access to high-capacity loops.¹⁵⁶ Given the low number of orders in Nevada, as noted above, we examine Pacific Bell’s performance in California. While the record reveals a number of performance disparities in Pacific Bell’s California performance measures, we find that these disparities are slight, some disparities were caused by one-time unusual events, and Pacific Bell has taken steps to improve performance.

56. In our review of the record, we find disparities in Pacific Bell’s California performance in the following categories: (1) Percent of Orders Given Jeopardy Notice; (2) Percent of Due Dates Missed, and Percent of Due Dates Missed Due to Lack of Facilities; and (3)

¹⁵³

See PM 21-2195401 (CA Average Time to Restore)

¹⁵⁴ Specifically, Pacific Bell had implemented a new Fault Isolation Test (FIT) that enables Pacific Bell technicians to interact directly with the competitive LECs in order to get a more complete, accurate description of the trouble, and consequently permits Pacific Bell and the competitive LEC to determine where in the two companies’ networks the trouble lies and to solve the trouble so that it is not as likely to reoccur. See *Pacific Bell California Order*, 17 FCC Rcd at 25721, para. 127 n.457. See also Nevada Bell Feb. 19 *Ex Parte Letter* Attach. at 6. In addition, since April 2002, Pacific Bell states that it provides more training for tracking and dispatch of maintenance troubles, has upgraded its dispatch system so that competitive LECs receive priority dispatch from field technicians, ensures that dispatched field technicians have expertise to resolve the service problem, and reviews all competitive LEC trouble tickets daily to ensure that no trouble tickets are delayed due to administrative error. See *Pacific Bell California Order*, 17 FCC Rcd at 25721, para. 127 n.457; see also Nevada Bell Feb. 19 *Ex Parte Letter* Attach. at 6 n.5.

¹⁵⁵ Nevada Bell Feb. 19 *Ex Parte Letter* Attach. at 6. Nevada Bell states that, before the FIT process was deployed, from January 2002 to March 2002, competitive LECs suffered repeat trouble rates for basic UNE loops averaging 12.25%. From April 2002, when FIT was fully deployed, through December 2002, repeat trouble rates have averaged around 9.4%. See *id.* Attach. at 6 n.5.

¹⁵⁶ See *Nevada Commission Order* at 146.

Average Time To Restore, and Frequency of Repeat Troubles in a 30-Day Period.” We address these performance measures in order.¹⁵⁸

57. First, in the relevant five-month data period for the instant application, Pacific Bell missed parity in the Percentage of Orders Given Jeopardy Notices for three months.” The Applicant states that these performance measures do not accurately represent the number of orders that were actually in jeopardy.¹⁶⁰ According to the Applicant, Pacific Bell’s software provisioning system sent jeopardy notices to competitive providers automatically whenever an order required special handling on Pacific Bell’s part.” This occurred even though the due date of these special orders was not, in fact, subject to being missed. On December 8, 2002, Pacific Bell upgraded its provisioning program to address this issue.¹⁶² Although Pacific Bell’s original software showed a disparity for December, the upgraded system showed that parity was met for that month.¹⁶³ Pacific Bell also met parity in January.¹⁶⁴

¹⁵⁷ See Appendix C; PM 5-523300 (CA Percent of Orders Given Jeopardy Notice) (measuring the number of placed orders for which Pacific Bell sent a notice that completion of the order by the promised due date was in jeopardy); PM 11 (CA Percent of Due Dates Missed); PM 12 (CA Percent of Due Dates Missed Due to Lack of Facilities); PM 21-2195801 (CA Average Time to Restore) (measuring how long it takes Pacific Bell to complete a competitive LEC trouble ticket); PM 23-2392801 (CA Frequency of Repeat Troubles in a 30-Day Period) (measuring the percentage of customer trouble reports within 30 days of a prior customer trouble report).

¹⁵⁸ We also found slight disparities in the length of time it takes Pacific Bell, upon request from a competitive LEC, to qualify loops during the pre-ordering stage. See PM 1-105600 (CA Average Time to Pre-Order Mechanical Loop Qualification Actual – Verigate); PM 1-106007 (CA Average Time to Pre-Order Mechanical Loop Qualification Actual – EDI-CORBA). However, the disparity in Pacific Bell’s performance for these manual searches was only a matter of seconds, and we find it to be not competitively significant. See Appendix C.

¹⁵⁹ PM 5-523300 (CA Percentage of Orders Given Jeopardy Notices). The comparable percentage numbers of orders given jeopardy notices were 6.33, 9.07, 8.17, 5.72, and 4.75 for competitive LECS and 4.38, 4.10, 4.06, 5.92, and 5.20 for September, October, November, December, and January for Pacific Bell’s retail analogue respectively.

¹⁶⁰ Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1

¹⁶¹ Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1. “Special handling” is necessary whenever a facilities request falls out of the automatic assignment process and must be manually handled, as in instances where fieldwork may be required to complete an order. See *id.*

¹⁶² Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1

¹⁶³ Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1. The Applicant states that it does not have appropriate data to restate the months of September through November for Pacific Bell’s performance on these measures. Pacific Bell failed to meet the 95% benchmark for giving advance notice that an order might not be completed by its due date in November and December. PM 6-648200 (CA Average Jeopardy Notice Interval). The benchmark required that notice be given three hours before close of business 95% of the time that jeopardy notices were issued. Pacific Bell failed that standard by scoring 67, 78, and 75% in November, December, and January respectively. To place these numbers in perspective, however, the Applicant states that, in November and December, Pacific Bell installed over 1000 DSI loop orders, and only 15 of those missed their due dates. Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1. Of these 15 jeopardies, notices on only four were not sent out within three hours of the committed due date. Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 1-2. In January, Pacific Bell installed over 580 DSI loop orders, and of that number, only seven were placed in jeopardy. Letter from Colin S. Stretch, counsel for Nevada Bell, to (continued....)

58. Second, Pacific Bell experienced performance disparities **for** (a) Percent of Due Dates Missed, and (b) Percent of Due Dates Missed Due to Lack of Facilities. As a preliminary matter, we note that the discrepancy in performance is minimal.'" More importantly, the Applicant states that each month's miss was due to one-time events that distorted that month's metric numbers. For example, for the month of November, the Applicant states that heavy rains in the Northern California area caused **an** unusually high number of loops to **fail**.¹⁶⁶ Again in January 2003, Northern California suffered not only heavy rains. but the Applicant was also prevented by holiday construction restrictions to gain access to underground facilities in order to complete **orders**.¹⁶⁷ Given the slight disparity in the performance figures and the unique

(Continued from previous page)

Marlene H. Dortch, Secretary, Federal Communications Commission. WC Docket No. 03-10. Attach. A, at 1 (filed March 11, 2003) (Nevada Bell Mar. 11 *Ex Parte* Letter).

¹⁶⁴ See Appendix C

¹⁶⁵ For PM 11 (CA Percent of Due Dates Missed), the comparable percentages of due dates missed were 1.96, 2.83, 3.12, 3.59, and 2.41% for the competitive LECs and 3.13, .57, 1.00, **1.28**, and .79% for Pacific Bell's retail affiliate for the months of September, October, November, December and January respectively. For this measure, Pacific Bell failed to achieve parity in October, November, December, and January. For PM 12 (CA Percent of Due Dates Missed Due to Lack of Facilities), the percentage of due dates missed was .98, 1.19, 1.66, 2.39, and **2.07**% for the competitive LECs and .72, .14, .28, **.85**, and **1.11**% for Pacific Bell's retail affiliate for the months of September, October, November, December, and January, respectively. For this measure, Pacific Bell failed to reach parity in October, November, December and January.

¹⁶⁶ The Applicant explains in more detail:

Each [California] shortfall was due to an independent event affecting discreet market areas. In October, missed due dates in the North region caused the performance shortfall. This was the only month among the last five months in which Pacific's performance in the North region did not achieve parity. In November, heavy rains in the Bay region contributed to a higher than usual number of bad cable facilities, causing a slightly higher miss rate for DSI loops. Pacific did not miss either PM 11 or PM 12 for DSI loops in the Bay region in any other month in 2002. Finally, in December, issues associated with late engineering designs in the LA region for DSI loops caused a performance shortfall in that region. As in the Bay region, this was the first time in 2002 that Pacific's LA region performance for PMs 11 and 12 fell short of parity. Even apart from the isolated nature of these performance shortfalls, in absolute terms Pacific's performance provisioning DSI loops has been strong. In the months of September through December, the percentage of due dates missed for DSI loops was never greater than 3.6%.

Nevada Bell Feb. 19 *Ex Parte* Letter Attach. at 2.

¹⁶⁷ The Applicant explains further:

In the North[ern California] region, Pacific [Bell] missed nine due dates, all as a result of lack of facilities. Two of the misses were due to the California Highway Department's holiday restrictions, which did not allow access to needed underground facilities during the first few days of January **2003**. Another two misses were due to wet cables from the late December rains. Three misses were generated because needed construction work was so extensive that it could not be completed by the committed due date. The final two misses represent orders that were missed due to a Customer Not Ready ('CNR') condition. Though Pacific [Bell] was ready to install these orders on time, the orders were shown as "misses" because they initially were placed in jeopardy status early on the due date, due to a lack of facilities.

Nevada Bell Mar. 11 *Ex Parte* Letter Attach. B at 3

circumstances surrounding each month's performance, we find no indication of discriminatory conduct. We note that, on February 20, 2003, the Commission announced in its ***Triennial Review*** proceeding that it will address competitive LEC requests that may require new facilities.¹⁶⁸ Although no commenter challenged the Applicant's showing of nondiscrimination in the performance measure Percent of Due Dates Missed Due to Lack of Facilities, in the wake of the ***Triennial Review Order***, a competitive LEC may assert arguments of discrimination in a section 271(d)(6) complaint proceeding, where there is an opportunity to build a complete

59. Third, Pacific Bell experienced performance disparities in the Average Time to Restore metric¹⁷⁰ and the Frequency of Repeat Troubles in 30-Day Period metric.¹⁷¹ These measures gauge how quickly Pacific Bell repairs a competitive LEC's customer problem and what percentage of customer trouble reports are made within 30 days of a prior trouble report.

60. The Applicant argues that the general underlying basis for these disparities is the difference in Pacific Bell's ability to test loops provided to competitive LECs as opposed to its ability to test loops provided to its retail affiliate.¹⁷² The Applicant states that its ability to resolve a customer's trouble in a timely fashion, and to prevent a recurrence of the trouble, depends in part on the competitive LEC's ability to identify troubles on its DSL service before submitting a trouble report to Nevada Bell or Pacific Bell.¹⁷³ The Applicant states that if the competitive LEC were to test xDSL loops for potential problems prior to provisioning, the number of customer troubles would decline in the first instance, thereby diminishing the number of repeat trouble reports. In addition, potential problems would be identified early in the process, thereby reducing Pacific Bell's average time to restore.¹⁷⁴

¹⁶⁸ The ***Triennial Review Order*** will be released in the near future. A press release issued by the Commission at the time it voted on the ***Triennial Review*** item states that incumbent LECs "are required to make routine network modifications to UNEs used by requesting carriers where the requested facility has been constructed and that incumbent LECs are required "to condition loops for the provision of xDSL services." See ***FCC Adopts New Rules For Network Unbundling Obligations of Incumbent Local Phone Carriers***, CC No. 01-338, Press Release (Feb. 20, 2003), Attach. at 3.

¹⁶⁹ ***Application by Verizon Maryland Inc., Verizon Washington, D.C. Inc., Verizon West Virginia Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance/ NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia***, WC Docket No. 02-384, Memorandum Opinion and Order, FCC 03-57, para. 122 (rel. Mar. 19, 2003) (***Cerizon MD/D.C./WVA Order***).

¹⁷⁰ PM 21-2195801 (CA Average Time to Restore UNE Lp 2w xDSL); PM 21-2196001 (CA Average Time To Restore UNE Lp 4w Dig HDSL).

¹⁷¹ PM 23-2392801 (CA Frequency of Repeat Troubles UNE Lp 2w xDSL)

¹⁷² Nevada Bell Mar. 11 ***Ex Parte*** Letter Attach. at 1

¹⁷³ See Nevada Bell Feb. 19 ***Ex Parte*** Letter Attach. at 3

¹⁷⁴ See Nevada Bell Feb. 19 ***Ex Parte*** Letter Attach. at 3

61. In September 2002, Pacific Bell began signal testing all DSL-capable **loops** for competitive LECs and Pacific Bell's retail affiliate, testing for both continuity of the loop and whether a data signal can be passed on the **circuit**.¹⁷⁵ Pacific Bell states that it will also perform synchronization tests for DSL service, if the competitive LEC provides test modems to Pacific Bell for the **testing**.¹⁷⁶ As a result of these new testing procedures, the Applicant states that repeat trouble reports have been reduced from levels of 18 to 25 percent for the January to August 2002, time frame to levels of 16 to 18 percent for September to December 2002.¹⁷⁷

62. However, we note with concern that, from September 2002 through January 2003, the percentage numbers of repeat troubles for competitive LECs climbed from 16.69 percent to 22.73 percent. The disparity in recurring troubles for Pacific Bell's retail affiliate and the recurring troubles for the competitive LECs widened from 4.43 percent in September 2002, to 9.51 percent in January 2003.¹⁷⁸ The Applicant argues that this increase in recurring competitive LEC troubles in January 2003, was due to wet weather conditions.¹⁷⁹ In addition, the apparent disparity in this measurement of recurring troubles is due, the Applicant states, to the types of recurring troubles that are measured.'''

63. The heavy January rains, the Applicant states, caused an increase in recurring **physical** failures of entire **loops**.¹⁸¹ For the competitive LECs, this increase is reflected in PM 23-2392801. For its retail affiliate, the Applicant states that an increase in the physical failure of its loops is reflected in voice-loop recurring trouble performance measurements.¹⁸² Our review of a

¹⁷⁵ See Nevada Bell Feb. 19 Ex Parte Letter Attach. at 3

¹⁷⁶ See Nevada Bell Feb. 19 Ex Parte Letter Attach. at 3. To date, only Pacific Bell's retail affiliate has provided test modems for synchronization testing. See *id.*

¹⁷⁷ See Nevada Bell Feb. 19 Ex Parte Letter Attach. at 3

¹⁷⁸ PM 23-2392801 (CA Frequency of Repeat Troubles UNE Lp 2w xDSL). The comparable percentage numbers of repeat troubles were 16.69, 17.84, 17.71, 17.60, and 22.73% for the competitive LECs and 12.09, 13.13, 12.36, 13.30, and 13.22% for Pacific Bell's retail affiliate. Pacific Bell failed to meet parity in September, October, November, December, and January.

¹⁷⁹ Nevada Bell Mar. 11 Ex Parte Letter Attach A at 1. The Applicant states that 72% of the repeat troubles were resolved at the cable facility. *Id.* at Attach A at 2.

¹⁸⁰ The Applicant explains that, for purposes of this performance measure, the retail analogue for xDSL loops that it provides to competitive LECs are line shared loops that Pacific Bell shares with its retail affiliate. Nevada Bell Mar. 11 Ex Parte Letter Attach A at 1. The Applicant states that PM 23-2392801 measures a recurring problem for its retail affiliate's line shared loop when there is a recurring trouble with only the data portion of the loop. If there is a trouble with the entire line shared loop that affects both the voice and data portions, the trouble is reponed under a performance metric that gauges recurring troubles for voice, not data. Nevada Bell Mar. 11 Ex Parte Letter Attach A at 2.

¹⁸¹ Nevada Bell Mar. 11 Ex Parte Letter Attach A at 1

¹⁸² Nevada Bell Mar. 11 Ex Parte Letter Attach A at 2

performance measurement reflecting recurring troubles of statewide residential POTs confirms a slight increase in Pacific Bell's retail affiliate's recurring trouble **rate**.¹⁸³

64. The record also demonstrates that, even though Pacific Bell continues to suffer a disparity in its Average Time to Restore xDSL trouble tickets, it shortened its average time to restore competitive xDSL trouble tickets by 3.47 hours between December 2002. and January 2003.¹⁸⁴ In light of this improvement, the overall minimal disparity in the average time to repair customer trouble reports,'*Pacific Bell's explanation of the January 2003, recurring trouble performance measures, and Pacific Bell's new offerings to trouble test **xDSL** capable loops prior to provisioning, we do not find any evidence of discrimination with regard to high-capacity loops.

65. *Line Sharing and Line Splitting.* Based on the evidence in the record, we find, as did the Nevada Commission, that Nevada Bell demonstrates that it provides nondiscriminatory access to the high frequency portion of the loop.¹⁸⁶ Given the **low** number of orders in Nevada, as noted above, we examine Pacific Bell's performance in California. To the extent that there were discrepancies in Pacific Bell's California performance with regard to line sharing and line splitting trouble reports after provisioning, such discrepancies do not appear to be competitively significant.¹⁸⁷ Moreover, as discussed in the high-capacity loop section above, Pacific Bell's new line testing procedures have lowered the percentage of trouble **reports**.¹⁸⁸

¹⁸³ See PM 23-2391600 (CA Frequency of Repeat 30 Day Troubles: Statewide Resale Residential POTS). On this performance measure, Pacific Bell's affiliate's repeat trouble rate increased from 11.22% to 12.46% from December 2002. to January 2003. The repeat trouble rate for competitive LECS on this performance measure increased from 6.52% to 10.3% during this same period.

¹⁸⁴ See PM 21-2195801 (CA Average Time to Restore UNE Lp 2w xDSL), the comparable numbers (in hours taken to restore service) were 17.32, 10.87, 16.69, 18.16, and 14.69 for the competitive LECs and 12.50, 9.86, 13.17, 14.12, and 12.01 for Pacific Bell's retail affiliate for the months of September, October, November, December, and January. Pacific Bell failed to meet parity in October, November, December, and January. See also PM 21-2196001 (CA Average Time to Restore UNE Lp 4w Dig HDSL). In the months submitted in this proceeding, Pacific Bell's performance (in hours taken to restore service)was 4.28, 3.88, 4.85, 3.91, and 3.25 for competitive LECs and 3.14, 3.10, 4.45, 4.46, and 3.62 for the Pacific Bell affiliate for the months September, October, November, December, and January. Pacific Bell failed to meet parity in September, October, November, and January.

¹⁸⁵ The disparity in the Average Time to Restore a DSL problem was in most months a matter of hours. See *Pacific Bell California Order*, 17 FCC Rcd at 25123, para. 130 n. 467 (noting that two hours difference in repair time for competitive LECs and Pacific Bell's retail affiliate was minimal).

¹⁸⁶ See *Nevada Commission Order* at 152-53

¹⁸⁷ See PM 16 (CA Percentage Troubles within 30 Days for Special Services Orders). Pacific Bell failed to meet parity for this performance measure during October, November, December, and January. For this measure, the comparable percentages of troubles with special orders were **2.08**, 3.47, **2.95**, 3.32, and 2.84 for the competitive LECs and **1.87**, **2.31**, 1.94, 3.08, and 1.78 for Pacific Bell's retail affiliate for the months September, October, November, December, and January. Pacific Bell missed parity for September, October, November, December, and January for CA Customer Trouble Report Rate. See 19-1994100 (CA Customer Trouble Report Rate). For this measure, the comparable percentages of trouble rates were .69, .95, .67, .64 and .8 for the competitive LECs and .42, (continued...)

B. Checklist Item 1 — Interconnection

66. Section 271(c)(2)(B)(i) requires the BOC to provide equal-in-quality interconnection on terms and conditions that are just, reasonable, and nondiscriminatory in accordance with the requirements of sections 251 and 252. Based on our review of the record, we conclude, as did the Nevada Commission, that Nevada Bell complies with the requirements of this checklist item.¹⁸⁹ In reaching this conclusion, we have examined Nevada Bell's performance with respect to collocation and interconnection trunks, as the Commission has done in prior section 271 proceedings. When analyzing Nevada Bell's showing, we first review Nevada performance data for measures where there are sufficient commercial volumes. However, for other measures, where volumes are low, we look to California data.

67. We reject the allegations of several paging carriers that Nevada Bell should fail this checklist item because it has refused to provide interconnection facilities and **has** charged

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.48, .43, .43 and .45 for Pacific Bell's retail affiliate for the months September, October, November, December, and January. In addition, Pacific Bell missed parity for October, November, and December for CA Frequency of Repeat Troubles in a 30-Day Period. *See* PM 23-2394000 (CA Frequency of Repeat Troubles in 30-Day Period). For this measure, the comparable percentages of repeat troubles were 14.44, 18.60, 17.65, 19.04, and **18.5** for the competitive LECs and 12.09, 13.13, 12.36, 13.10, and 13.22 for Pacific Bell's retail affiliate for the months of September, October, November, December, and January. Pacific Bell failed to meet parity in October, November, December, and January.

¹⁸⁸ The Applicant states Pacific Bell's efforts have reduced repeat trouble reports for competitive LEC line shared loops. *See* Nevada Bell Feb. 19 *Ex Parte* Letter Anach. at 3. According to the Applicant, repeat reports for line shared loops have gone down from 18 to 24% in the months January through August 2002, to 14.5 to 19% in the September to December 2002, timeframe. *See id*

¹⁸⁹ *See Nevada Commission Order* at 55-56. *See also Cerizon Massachusetts Order*, 16 FCC Rcd at 9092-95, paras. 183-87, 9097-98, paras. 194-95. We note that Nevada Bell met the parity standard for the vast majority of interconnection performance measures for which there was sufficient volume. *See* Appendix B. For Performance measures with low volumes, we note that Pacific Bell met the parity standard for the vast majority of interconnection performance measures in California. *See* Appendix C. The one performance measure for which Nevada Bell failed to meet the benchmark standard in Nevada was the Percent Blocking of Common Trunks measure. *See* PM 24-240010 (NV Percent Blocking on Common Trunks). For that performance measure, Nevada Bell failed the benchmark standard four of the five months reported by having between 3 and 6% of common trunks blocked, when the benchmark standard is 2%. Nevada Bell explains that for the misses in September and October, the trunk blockages were due in part to a one-time routing error on the part of a Nevada Bell employee, and in part due to overflow traffic onto the Nevada Bell common transpon network from one competitive LEC. *See* Nevada Bell Application App. A, Vol. 1, Tab 5, Affidavit of William C. Deere (Nevada Bell Deere Aff.) at paras. 34-42; *see also* Nevada Bell Feb. 19 *Ex Parte* *Purre Lerrer* Anach. at 6. Nevada Bell further explains that the performance shortfall in December was caused by a high volume of traffic from a telemarketer occurring for one hour on one day of the month, and the performance failure in January was also caused by a single trunk group being blocked greater than the objective level. Because of the small number of trunk groups in Nevada, Nevada Bell claims that significant overflow from even one competitive LEC can cause customer-affecting blocking levels on the network. Accordingly, Nevada Bell is requesting some modifications to this performance measure. Nevada Bell Feb. 19 *Ex Parte* *Lerrer* Anach. at 6; *see also* Nevada Bell Mar. 11 *Ex Parte* Letter Anach B at 9. We note that no competitive carriers commented on this performance or suggested that they were negatively affected by the common trunk blockage during these months. After evaluating Nevada Bell's explanations, we find that these misses do not overcome Nevada Bell's showing of checklist compliance.

these paging companies inappropriately for the delivery of interconnection **services**.¹⁹⁰ In response to these comments, Nevada Bell claims that it has provided all of the commenting carriers with interconnection facilities.'" Because Nevada Bell claims that these facilities are underutilized, it contends that it has not provided additional trunking requested by the paging carriers at issue. Instead, it has offered to work with the carriers to determine whether any additional trunking is **needed**.¹⁹² On the issue of billing paging carriers improperly, Nevada Bell claims that the charges at issue include those that incumbent LECs may charge paging carriers for facilities utilized for various services (*e.g.*, transit traffic and wide area calling services).'" Nevada Bell **further** claims that it has sought to negotiate interconnection agreements with the paging carriers that would resolve the issue of whether any refunds are owed and would address the question of what charges Nevada Bell is entitled to bill on a going-forward basis.'" According to Nevada Bell, the paging carriers have not been willing to engage in negotiations. In addition, Nevada Bell states that although it has submitted bills to these paging carriers, it has not taken adverse action against them for failure to pay the disputed charges.'" These paging carrier comments do not seem to suggest any systemic failure on the part of Nevada Bell, but instead appear to be carrier-specific complaints concerning Nevada Bell's conduct. **As** the Commission has found in prior section **271** proceedings, we find that the complaint process is the more appropriate forum to examine these types of carrier-specific factual disputes.¹⁹⁶ Indeed, at least two of the paging companies indicate that they have initiated some sort of enforcement action before both the Commission and the Nevada Commission against Nevada Bell.'" We would foreclose a possible resolution of this issue by the Nevada Commission were **we** to find that this issue warrants a finding of checklist noncompliance, and **we** decline to do so.

¹⁹⁰ See Edwards Industries Comments; January Communications Comments; Nevada Microwave Comments; NRTN Comments; and Satellite Page Comments. Specifically, Edwards Industries, Nevada Microwave, and NRTN claim that Nevada Bell has refused to provide interconnection services. Edwards Industries, January Communications, NRTN, and Satellite Page also claim that Nevada Bell has been billing inappropriately for the delivery of interconnection services.

¹⁹¹ Nevada Bell Application Supplemental Reply, Reply Affidavit of Daniel O. Jacobsen (Nevada Bell Jacobsen Reply **Aff.**), at paras. 10, 13-14.

¹⁹² Nevada Bell Jacobsen Reply Aff. at paras. 10, 14.

¹⁹³ Nevada Bell Jacobsen Reply Aff. at para. 6.

¹⁹⁴ Nevada Bell Jacobsen Reply Aff. at para. 8.

¹⁹⁵ Nevada Bell Jacobsen Reply Aff. at para. 8.

¹⁹⁶ As the Commission has found in past proceedings, the section 271 process simply could not function if we were required to resolve every interpretive dispute between a BOC and each competitive carrier about the precise content of the BOC's obligations to its competitors. See, *e.g.*, *SWBT Texas Order*, 15 FCC Rcd at 18366-67, 18541, paras. 22-27, 383; *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6355, para. 230.

¹⁹ See Edwards Industries Comments at 2; January Communications Comments at 2.

C. Remaining Checklist Items (3, 5-14)

68. In addition to showing that it is in compliance with the requirements discussed above, an applicant under section 271 must demonstrate that it complies with checklist item 3 (access to poles, ducts, and conduits),¹⁹⁸ item 5 (transport),¹⁹⁹ item 6 (unbundled local switching),²⁰⁰ item 7 (911/E911 access and directory assistance/operator services),²⁰¹ item 8 (white pages directory listings),²⁰² item 9 (numbering administration),²⁰³ item 10 (databases and associated signaling),²⁰⁴ item 11 (number portability),²⁰⁵ item 12 (local dialing parity),²⁰⁶ item 13 (reciprocal compensation),²⁰⁷ and item 14 (resale).²⁰⁸ Based on the evidence in the record, we conclude, as did the Nevada Commission, that Nevada Bell demonstrates that it is in compliance with these checklist items in Nevada.²⁰⁹ None of the commenting parties challenge Nevada Bell's compliance with these checklist items.

V. SECTION 272 COMPLIANCE

69. Section 271(d)(3)(B) provides that the Commission shall not approve a BOC's application to provide interLATA services unless the BOC demonstrates that the "requested authorization will be carried out in accordance with the requirements of section 272."²¹⁰ Based

¹⁹⁸ 47 U.S.C. § 271(c)(2)(B)(iii).

¹⁹⁹ 47 U.S.C. § 271(c)(2)(B)(v).

²⁰⁰ 47 U.S.C. § 271(c)(2)(B)(vi).

²⁰¹ 47 U.S.C. § 271(c)(2)(B)(vii).

²⁰² 47 U.S.C. § 271(c)(2)(B)(viii).

²⁰³ 47 U.S.C. § 271(c)(2)(B)(ix).

²⁰⁴ 47 U.S.C. § 271(c)(2)(B)(x).

²⁰⁵ 47 U.S.C. § 271(c)(2)(B)(xi).

²⁰⁶ 47 U.S.C. § 271(c)(2)(B)(xii).

²⁰⁷ 47 U.S.C. § 271(c)(2)(B)(xiii).

²⁰⁸ 47 U.S.C. § 271(c)(2)(B)(xiv). We note that, regarding advanced services, Nevada Bell provides the same resale offerings in Nevada as Pacific Bell provides and we approved in California. See Nevada Bell Application at 64; *Pacific Bell California Order*, 17 FCC Rcd at 25713-15, paras. 110-15.

²⁰⁹ Nevada Bell Application at 39-40 (checklist item 3), 54-55 (checklist item 5), 56-57 (checklist item 6), 57-59 (checklist item 7), 59-60 (checklist item 8), 60 (checklist item 9), 60-61 (checklist item 10), 61-63 (checklist item 11), 63 (checklist item 12), 63-64 (checklist item 13), and 64-67 (checklist item 14); Nevada Commission Order at 133-36 (checklist item 3), 156-61 (checklist item 5), 161-66 (checklist item 6), 166-75 (checklist item 7), 175-79 (checklist item 8), 179-81 (checklist item 9), 181-87 (checklist item 10), 187-93 (checklist item 11), 193-95 (checklist item 12), 195-97 (checklist item 13), and 197-205 (checklist item 14).

²¹⁰ 47 U.S.C. § 271(d)(3)(B); Appendix D at paras. 68-69.

on the record, we conclude that Nevada Bell has demonstrated that it will comply with the requirements of section 272.2“ Significantly, Nevada Bell provides evidence that it maintains the same structural separation and nondiscrimination safeguards in Nevada as it does in California.²¹² No party challenges Nevada Bell’s section 272 showing.²¹³

VI. PUBLIC INTEREST

70. Apart from determining whether a BOC satisfies the competitive checklist of section 271 and will comply with section 272. Congress directed the Commission to assess whether the requested authorization would be consistent with the public interest, convenience, and necessity?“ At the same time, section 271(d)(4) of the Act states in full that “[t]he Commission may not, by rule or otherwise, limit or extend the terms used in the competitive checklist set forth in subsection (c)(2)(B).”²¹⁵ Accordingly, although the Commission must make a separate determination that approval of a section 271 application is “consistent with the public interest, convenience, and necessity,” it may neither limit nor extend the terms of the competitive checklist of section 271(c)(2)(B). The Commission views the public interest requirement as an opportunity to review the circumstances presented by the application to ensure that no other relevant factors exist that would frustrate the congressional intent that markets be open, as required by the competitive checklist, and that entry will serve the public interest as Congress expected.

71. We conclude that approval of this application is consistent with the public interest. From our extensive review of the competitive checklist, which embodies the critical elements of market entry under the Act, we find that barriers to competitive entry in the local exchange markets have been removed and the local exchange markets in Nevada today are open to competition. We further find that the record confirms our view. as noted in prior section 271 orders, that BOC entry into the long distance market will benefit consumers and competition if the relevant local exchange market is open to competition consistent with the competitive

²¹¹

See Nevada Bell Application at 77-78: Nevada Bell Application App. A, Vol. I, Tab I, Affidavit of Joe Carrisalez (Nevada Bell Carrisalez Aff.); Nevada Bell Application App. A, Vol. 2a-c, Tab 8. Affidavit of Robert L. Henrichs (Nevada Bell Henrichs Aff.); Nevada Bell Application App. A, Vol. 5, Tab 20, Affidavit of Linda G. Yohe (Nevada Bell Yohe Aff.).

²¹²

See Nevada Bell Carrisalez Aff. Attach. A at para. 5; Nevada Bell Henrichs Aff. Attach. C at para. 9; Nevada Bell Yohe Aff. Attach. A at para. 7. See also Pacific *Bell California Order*, 17 FCC Rcd at 2573 1-33, paras. 145-46; *SWBT Arkansas/Missouri Order*, 16 FCC Rcd at 20780-81, paras. 122-23; *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6370-74, paras. 256-65; *SWBT Texas Order*, 15 FCC Rcd at 18548-57, paras. 3944 15.

²¹³

Ernst & Young has completed the first independent audit of SBC’s section 272 compliance pursuant to section 53.209 of the Commission’s rules, 47 C.F.R. § 53.209. See Letter from Brian Horst, Partner, Ernst & Young, to Marlene H. Dortch, Secretary, Federal Communication Commission (Sept. 16, 2002) (transmitting audit report). Although the audit raises issues that may require further investigation, the audit results, standing alone, are insufficient to establish whether Nevada Bell is in compliance with section 272.

²¹⁴

47 U.S.C. § 271(d)(3)(C); Appendix D at paras. 70-71.

²¹⁵

47 U.S.C. § 271(d)(3)(C).

checklist. Moreover, in the absence of any arguments made, or evidence presented by commenters to the contrary, we find no reason to depart from this general assumption.

72. In addition, we find that the Nevada Commission's PIP provides further assurances that Nevada Bell will keep the local exchange markets open.²¹⁶ Although it is not a requirement for section 271 approval that a BOC be subject to such post-entry performance assurance mechanisms, such mechanisms are probative evidence that the BOC will continue to keep the local exchange markets open in the public interest.”

73. We have examined key aspects of Nevada's PIP and find that the plan is likely to provide incentives that **are** sufficient to foster post-entry checklist compliance. As in prior section 271 orders,”* we find present in the Nevada Commission plan the following elements necessary for a successful performance assurance plan: total liability at risk in the plan for failure to meet performance measurements; structure of the plan; self-executing nature of remedies of the plan; data validation and audit procedures of the plan; and accounting requirements.” The Nevada Commission will also, from time to time, reexamine and amend performance measures and the incentive plan to ensure that they reflect changes in the telecommunications industry.” No commenter has argued or presented evidence that the Nevada incentives plan is in any way deficient in continuing to protect the public interest embodied in section **271**.

VII. SECTION 271(d)(6) ENFORCEMENT AUTHORITY

74. Section 271(d)(6) of the Act requires Nevada Bell to continue to satisfy the “conditions required for . . . approval” of its section 271 application after the Commission approves its application.” Thus, the Commission has a responsibility not only to ensure that Nevada Bell is in compliance with section 271 today, but also that it remains in compliance in the future. As the Commission has already described the post-approval enforcement framework

²¹⁶ See *Pacific Bell California Order*, 17 FCC Rcd at 25738, para. **160 n. 570**. We note that in all of the applications granted by the Commission, the applicant was subject to a performance assurance plan designed to protect against backsliding from its section **271** obligations once the BOC enters the long distance market.

²¹⁷ See *Pacific Bell California Order*, 17 FCC Rcd at **25738**, para. **160 n. 571**; *Verizon New Jersey Order*, 17 FCC Rcd at **12362**, para. **176**; *Ameritech Michigan Order*, 12 FCC Rcd at **20748-50**, paras. 393-98.

²¹⁸ See *Pacific Bell California Order*, 17 FCC Rcd at **25738-39**, para. 161; *Verizon Massachusetts Order*, 16 FCC Rcd at 9121-25, paras. **240-47**; *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at **6377-81**, paras. **273-78**.

²¹⁹ See *Nevada Commission Order* at **207-13**; Nevada Bell Application at **76-77**; Nevada Bell Johnson Aff. at paras. **201-08.211-12.215**.

²²⁰ See *Nevada Commission Order* at **209-10**; see also *Pacific Bell California Order*, 17 FCC Rcd at **25739-40**, para. **163** (noting with approval that the California Commission would continue to review that state's performance measures and incentives plans and make “adjustments and modifications to the components, if necessary”).

²²¹ 47 U.S.C. § 271(d)(6).

and its section 271(d)(6) enforcement powers in detail in prior orders, it is unnecessary to do *so* again here.”

75. Working in concert with the Nevada Commission, we intend to monitor closely Nevada Bell’s post-approval compliance for Nevada to ensure that Nevada Bell does not “cease[] to meet any of the conditions required for [section 271] approval.”” We stand ready to exercise our various statutory enforcement powers quickly and decisively in appropriate circumstances to ensure that the local market remains open in Nevada. We are prepared to **use** our authority under section 271(d)(6) if evidence shows market opening conditions have not been maintained.

76. We require Nevada Bell to report to the Commission all Nevada carrier-to-carrier performance measure results and PIP reports beginning with the first full month after the effective date of this Order, and for each month thereafter for one year unless extended **by** the Commission. These results and reports will allow **us** to review, on an ongoing basis, Nevada Bell’s performance to ensure continued compliance with the statutory requirements. We are confident that cooperative state and federal oversight and enforcement can address any backsliding that may arise with respect to Nevada Bell’s entry into the Nevada long distance marker.”

VIII. CONCLUSION

’77. For the reasons discussed above, we grant Nevada Bell’s application for authorization under section 271 of the Act to provide in-region, interLATA services in the State of Nevada.

²²² See, e.g., *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6382-84, paras. 283-85; *SWBT Texas Order*, 15 FCC Rcd at 18567-68, paras. 434-36; *Bell Atlantic New York Order*, 15 FCC Rcd at 4174, paras. 446-53.

²²³ 47 U.S.C. § 271(d)(6)(A)

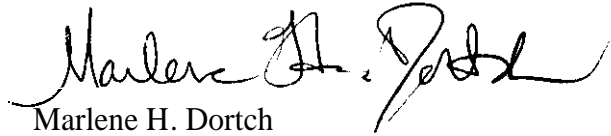
²²⁴ See, e.g., *Bell Atlantic-New York, Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, Order, 15 FCC Rcd 5413, 5413-23 (2000) (adopting consent decree between the Commission and Bell Atlantic that included provisions for Bell Atlantic to make a voluntary payment of \$3,000,000 to the United States Treasury with additional payments if Bell Atlantic failed to meet specific performance standards and weekly reponing requirements to gauge Bell Atlantic’s performance in correcting the problems associated with its electronic ordering systems).

IX. ORDERING CLAUSES

78. Accordingly, IT IS ORDERED that, pursuant to sections 4(i), 4(j), and 271 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), and 271, Nevada Bell's application to provide in-region, interLATA service in the State of Nevada. filed on January 14, 2003, IS GRANTED.

79. IT IS FURTHER ORDERED that this Order SHALL BECOME EFFECTIVE April 25, 2003.

FEDERAL COMMUNICATIONS COMMISSION

A handwritten signature in black ink, appearing to read "Marlene H. Dortch", is written over the printed name.

Marlene H. Dortch
Secretary

APPENDIX A**Commenters in WC Docket No. 03-10**Commenters

Alliance for Public Technology
Edwards Industries
Department of Justice
January Communications
Nevada Radio Telephone Network
Nevada Microwave
Nevada Public Utilities Commission
State of the Arts Communications and Electronics
REC Networks
WorldCom, Inc.

Reuly Commenters

Nevada Bell
WorldCom, Inc.

Abbreviation

APT
Edwards Industries
Department of Justice
January Communications
NRTN
Nevada Microwave
Nevada Commission
Satellite Page
REC
WorldCom

Abbreviation

Nevada Bell
WorldCom

Appendix B

Nevada Performance Metrics

Except where noted, the data included here are taken from the Nevada performance reports provided by Nevada Bell, calculated according to the Nevada Performance Measurement Plan as of 9/12/02. This table is provided as a reference tool for the convenience of the reader. No conclusions are to be drawn from the raw data contained in this table. Our analysis is based on the totality of the circumstances, such that we may use non-metric evidence, and may rely more heavily on some metrics more than others, in making our determination. The inclusion of these particular metrics in this table does not necessarily mean that we relied on all of these metrics, or that other metrics may not also be important in our analysis. Some metrics that we have relied on in the past and may **rely** on for a future application were not included here because there was no data provided for them (usually either because there was no activity, or because the metrics are still under development).

Metrics with no retail analog provided are usually compared with a benchmark. Note that for some metrics during the period provided there **may be** changes in the metric definition, or changes in the retail analog applied, making it difficult to compare data over time.

Metric Number	Metric Name	Metric Number	Metric Name
		23	

Provisioning

5	Percent of Orders Jeopardized
6	Jeopardy Notices Returned by the Required Interval
7	Completed Interval
8	Percent Completed Within Standard Interval as a Percentage On-Time
9	Coordinated Customer Conversion
9a	Frame Due Time (FDT) Conversions as a Percentage on Time
10	LNP Network Provisioning
11	Percent of Due Dates Missed
12	Percent Company Missed Due Dates Due to Lack of Facilities
13	Delay Order Interval to Completion Date
14	Held Order Interval
15	Provisioning Trouble Reports
15a	Average Time to Restore Provisioning Troubles
16	Percent Troubles in 30 Days for New Orders (Specials)
17	Percent Troubles in 10 Days for New Orders (Non-Specials)
18	Average Completion Notice Interval

Billing

38	Usage Timeliness
30	Wholesale Bill Timeliness
31	Usage Completeness
32	Recurring Charge Completeness
33	Non-Recurring Charge Completeness
34	Bill Accuracy
35	Billing Completion Notice Interval

Collocation

19	Customer Trouble Report Rate
20	Percent of Customer Trouble not Resolved within Estimated
21	Average Time to Restore
22	POTS Out of Service Less Than 24 Hours

44	Center Responsiveness
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Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept.2002		Oct.2002		Nov. 2002		Dec.2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
Pre-Ordering												
1 - Average Response Time (to Pre-Order Queries)												
1 - 103300	Man Fax: Req for CSR	100.00		96.00		100.00		100.00		100.00		
1 - 105101	K1023: Man Qual - All Other Products	0.39	10.52	1.21	5.32	2.64	7.71	0.85	3.85	1.44	7.52	abcde
1 - 105102	K1023: Man Qual - xDSL & Line Sharing Loops	1.25	0.82	0.43	1.02	1.08	0.99	0.65	1.21	0.77	0.46	abcde
1 - 107001	Mech Verigate: Add Verif	1.57		1.94		2.75		1.93		1.82		
1 - 107101	Mech Verigate: Request TN	7.27		7.09		8.21		6.32		4.44		
1 - 107201	Mech Verigate: Request CSR	3.60		3.65		6.21		5.06		4.36		
1 - 107301	Mech Verigate: Svc Avail	0.86		0.96		1.95		0.81		0.84		
1 - 107500	Mech Verigate: Rej/Fail Inq	2.58		3.61		9.84		1.84		3.81		
1 - 107501	Mech Verigate: Dispatch Req/Fac Avail	nd		nd		nd		nd		5.91		abcde
1 - 107700	Mech Lp Qual: Verigate Mech Lp Qual Actual	13.43	9.48									
1 - 107702	Mech Lp Qual: Verigate Mech Lp Qual Actual			100.00		98.46		92.65		93.18		
1 - 107800	Mech Loop Qual: Verigate Mech Loop Qual Design	4.34	3.69									a
1 - 107802	Mech Loop Qual: Verigate Mech Loop Qual Design			100.00		100.00		100.00		100.00		b
1 - 108001	Mech EDI/COBRA: Address Verification	5.19		3.00		nd		1.43		nd		a cde
1 - 108101	Mech EDI/COBRA: Request TN	1.62		5.30		nd		2.66		nd		abcde
1 - 108201	Mech EDI/COBRA: Request CSR	1.90		2.27		3.22		0.70		0.86		
1 - 108500	Mech EDI/COBRA: Rej/Fail Inq	1.39		2.04		1.27		0.95		0.77		
Ordering												
2 - Average FOC Notice Interval												
2 - 200101	Elect/Elect - Resale Res POTS	0.05		0.04		0.04		0.04		0.05		
2 - 200201	Elect/Elect - Resale Bus POTS	0.02		0.02		0.03		0.03		0.02		abcd
2 - 201101	Elect/Elect - UNE 2/4w (8db & 5.5db) Weight 2/4w Anal Lp (incl Coin/Anal PBX)	0.02		0.04		0.02		0.03		0.02		
2 - 201201	Elect/Elect - UNE Lp 2w Dig ISDN Cap	0.02		0.02		nd		nd		0.02		abcde
2 - 201301	Elect/Elect - UNE Lp 2w Dig xDSL Cap (A,H,I,S)	0.02		0.05		0.02		0.04		0.02		
2 - 201403	Elect/Elect - UNE Lp 4w Dig 1.544 mbpd Cap/HDSL	0.02		0.02		0.02		0.04		0.02		a cde
2 - 202201	Elect/Elect - UNE Pltfrm Basic Port & (8db & 5.5db)	0.19		0.14		0.15		0.18		nd		abcde
2 - 204004	Elct Man- UNE Voice-Grade Lp - Enhance Extend	nd		nd		2.12		0.68		2.65		abcde
2 - 204005	Elct Man- UNE 4w Dig DS1 Lp - Enhance Extend	1.58		0.33		1.42		1.87		1.33		abcd
2 - 205301	Man-Man- Resale Res POTS	1.39		1.77		2.21		1.41		1.64		
2 - 205401	Man-Man- Resale Bus POTS	2.89		2.68		3.02		2.54		2.44		
2 - 205600	Man-Man- Resale Centrex	2.44		2.68								

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
2 - 206101	Man-Man- Resale Specials					3.66		2.57	-	2.91		
2 - 206600	Man-Man- UNE 4w Dig 1.544 mbps Cap/HDSL (DS1 Lp)	nd		nd		6.78		nd		nd		abcde
2 - 207302	Man-Man- UNE Ded Transport DS3	nd		nd		8.17		nd		nd		abcde
2 - 207801	Projects All Systems- Projects	100.00		100.00		100.00		100.00		nd		abcde
2 - 207802	Projects All Systems- Proj Interconnect Trks	1.79		nd								b
2 - 207804	Projects All Systems- Proj Interconnect Trks-New					100.00		100.00		100.00		cde
2 - 208105	Elect/Elect- High Bandwidth Line Share UNE	0.02		0.02		0.02		0.02		0.02		abcde
2 - 208205	Elect/Man- High Bandwidth Line Share UNE	2.92		1.62		2.58		nd		0.85		a cde
2 - 209000	Interconnect Trks- Interconnect Trks - New (in days)	0.00		2.67		2.00		nd		3.00		abcde
2 - 209100	Interconnect Trks- Interconnect Trks - Augment (in days)	1.20		1.55		2.00		0.25		1.55		a cd
2 - 211405	Elect/Elect- UNE EELS - DS1	0.02		0.02		nd		nd		0.02		abcde
2 - 212500	Elect/Elect- LNP Simple	0.02		0.02		0.02		0.02		0.08		abcde
2 - 212700	Elect/Man- Resale Res POTS	1.11		1.01		1.29		1.14		1.32		
2 - 212800	Elect/Man- Resale Bus POTS	1.79		1.75		1.66		1.97		2.27		a cd
2 - 213100	Elect/Man- Resale PBX	nd		3.33								ab
2 - 213501	Elect/Man- Resale Specials					2.77		2.27		2.04		cd
2 - 213601	Elect/Man-UNE 2/4w (8db&5.5db) weighted 2/4w Anal Lp (incl Coin/Anal PBX)	1.83		1.76		2.81		1.50		1.23		
2 - 213800	Elect/Man- UNE Lp 2w Dig ISDN Cap	1.76		1.72		nd		nd		3.18		abcde
2 - 213900	Elect/Man- UNE Lp 2w Dig xDSL Cap (A,H,I,S)	5.22		2.24		1.94		1.71		1.54		
2 - 214000	Elect/Man- UNE Lp 4w Dig 1.544 mbps Cap	1.47		2.07		1.74		1.56		0.94		
2 - 214702	Elect/Man- UNE Ded Trnspt - DS3	1.40		nd		nd		nd		nd		abcde
2 - 214800	Elect/Man- UNE Pltfrm Basic Port & (8db & 5.5db) Basic Loop	6.86		nd		nd		nd		2.32		abcde
2 - 215101	Elect/Man- Standalone LNP	1.69		1.84		2.58		1.77		1.68		
2 - 216300	Elect/Man- UNE 2/4w (8db & 5.5db) wt 2/4w Anal Lp (incl Coin/Anal PBX)	nd		nd		2.10		nd		nd		abcde
2 - 217700	Man/Man- Standalone LNP	6.28		nd		nd		nd		nd		abcde
3 - Average Reject Notice Interval												
3 - 300201	Elct:LEX-CLEO/LASR Stand Alone Dir List Syntax (edit engine) Rej Notice	0.03		0.09		0.04		0.03		0.08		de
3 - 300202	Elct/Elct: LEX CLEO/LASR Othr Fac Base/UNE Syntax (edit eng) Rej Not	0.02		0.02		0.02		0.02		0.02		

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
3 - 300301	Elct: Elct/Elct:LEX-CLEO/LASR Resale Syntax (edit eng) Rej Not	0.07		0.10		0.05		0.07		0.05		
3 - 300401	Elct/Elct:EDI-CLEO/LASR Othr Fac Base UNE Syntax (edit eng) Rej Not	0.15		nd		nd		0.15		0.15		bcde
3 - 300700	Elct Man:LEX-CLEO/LASR:(Exc to LSC) Facilities Content Errs	2.39		1.63		1.40		1.41		1.82		
3 - 300800	Elct Man:LEX-CLEO/LASR:(Exc to LSC) Resale Content Errs	1.66		0.94		1.74		1.32		1.59		cd
3 - 300900	Elct Man:EDI-CLEO/LASR:Otr Fac Base/UNE Content Errs (otr edits)Rej Ntc	2.71		1.70		nd		3.92		1.64		abcde
3 - 301300	Man-Man:CESAR Facilities Content Errors	2.57		2.06		2.66		2.41		2.37		
3 - 310100	Elect/Man: Fac Content Errors (othr edits) Rej Not	nd		nd		nd		3.65		2.05		abcde
3 - 320000	Projects: Projects	100.00		100.00		100.00		100.00		100.00		bcde
4 - Percent of Flow-Through Orders												
4 - 410400	LEX/EDI LASR FTE:Standalone LNP-Svc Migration w/chgs	42.11		8.70		10.00		7.14		9.68		
4 - 410500	LEX/EDI LASR FTE:UNE Lp 8db wt 2w anal bas-New Svc Install	70.00		86.96		71.43		75.00		77.78		
4 - 410700	LEX/EDI LASR FTE:UNE Lp 2w dig xDSL cap-New Svc Install	86.67		75.00		54.55		76.00		70.45		
4 - 410801	LEX/EDI LASR FTE:UNE Lp 4w dig (1.544 mbps cap) New Svc Install	0.00		0.00		0.00		0.00		0.00		a
4 - 410900	LEX/EDI LASR FTE:UNE 8db wt 2w anal bas-Svc Disconnect	48.21		69.23		29.23		29.03		40.74		
4 - 411100	LEX/EDI LASR FTE:UNE Lp 2w dig ISDN-Svc	33.33		20.00		50.00		nd		nd		abcde
4 - 411200	LEX/EDI LASR FTE:UNE Lp 2w dig xDSL cap-Svc Disconnect	0.00		9.52		21.43		50.00		20.00		
4 - 411300	LEX/EDI LASR FTE:UNE Lp 4w dig(1.544 mbps)-Svc Disconnect	88.89		58.82		100.00		54.55		100.00		a e
4 - 411500	LEX/EDI LASR FTE:LNP w/Loop-Svc Migration w/chgs	nd		18.75		41.03		33.33		20.00		a
4 - 411700	LEX/EDI LASR FTE:UNE Platform(Loop & Prt)-Svc Disconnect	66.67		100.00		100.00		100.00		nd		abcde
4 - 412000	LEX/EDI LASR FTE:UNE Platform(Loop w/Prt)-Chg Activities	0.00		nd		nd		100.00		nd		abcde

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
4 - 412100	LEX/EDI LASR FTE:Hgh Bndwdt Line Share-New Svc Install	100.00		100.00		50.00		nd		100.00		abcde
4 - 412200	LEX/EDI LASR FTE:Hgh Bndwdt Line Share-Svc Disconnect	0.00		0.00		0.00		100.00		40.00		a cd
4 - 412300	LEX/EDI LASR FTE:UNE Lp 2w dig IDSL cap-Svc Disconnect	0.00		0.00		0.00		0.00		0.00		cde
4 - 412400	LEX/EDI LASR FTE:UNE EELs-Voice Grade-Svc Disconnect	nd		nd		0.00		0.00		nd		abcde
4 - 412600	LEX/EDI LASR FTE:UNE EELs-DS1-Svc Disconnect	100.00		100.00		nd		0.00		100.00		abcde
4 - 412700	LEX/EDI LASR FTE:UNE EELs-DS1-New Svc Install	0.00		0.00		0.00		0.00		0.00		abcde
4 - 420501	LEX/EDI LASR FTE: Resale Res POTS-New Svc Install	26.58		30.49		37.04		33.87		26.39		
4 - 420601	LEX/EDI LASR FTE: Resale Res POTS-Chg Activities	75.00		83.33		100.00		100.00		25.00		abcde
4 - 420701	LEX/EDI LASR FTE: Resale Res POTS-Svc Disconnect	100.00		100.00		98.28		98.78		97.37		
4 - 420801	LEX/EDI LASR FTE: Resale Res POTS-Svc Mig w/out chgs	100.00		nd		0.00		nd		nd		abcde
4 - 421201	LEX/EDI LASR FTE: Resale Bus POTS-New Svc Install	0.00		0.00		0.00		0.00		nd		abcde
4 - 421301	LEX/EDI LASR FTE: Resale Bus POTS-Chg Activities	50.00		100.00		80.00		100.00		100.00		abcde
4 - 421401	LEX/EDI LASR FTE: Resale Bus POTS-Svc Disconnect	nd		100.00		66.67		nd		100.00		abcde
4 - 421501	LEX/EDI LASR FTE: Resale Bus POTS-Svc Migration w/out	100.00		nd		50.00		50.00		46.67		abcd
4 - 421601	LEX/EDI LASR FTE: Resale Bus POTS-Svc Migration w/chgs	0.00		0.00		nd		nd		0.00		abcde
4 - 430100	LEX/EDI LASR:UNE Lp 8db wt 2 w anal basic-New Svc Install	70.00		86.96		71.43		75.00		77.78		
4 - 430300	LEX/EDI LASR:UNE Lp 8db wt 2 w anal basic-Svc Disconnect	48.21		69.23		29.23		29.03		40.74		
4 - 430401	LEX/EDI LASR:UNE Lp 8db wt 2 w anal basis-Move Activites	0.00		nd		nd		nd		0.00		abcde
4 - 431300	LEX/EDI LASR:UNE Lp 2w dig ISDN-New Svc Install	nd		0.00		nd		nd		0.00		abcde
4 - 431500	LEX/EDI LASR:UNE Lp 2w dig ISDN cap-Svc Disconnect	33.33		20.00		50.00		nd		nd		abcde
4 - 431700	LEX/EDI LASR:UNE Lp 2w dig xDSL cap-New Svc Install	86.67		75.00		54.55		76.00		70.45		
4 - 431800	LEX/EDI LASR:UNE Lp 2w dig xDSL cap-Chg	nd		nd		nd		100.00		0.00		abcde

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
4 - 431900	LEX/EDI LASR:UNE Lp 2w dig xDSL cap-Svc Disconnect	0.00		9.52		21.43		50.00		20.00		
4 - 432100	LEX/EDI LASR:UNE Lp 2w dig IDSL cap-New Svc	0.00		0.00		0.00		0.00		0.00		abcde
4 - 432200	LEX/EDI LASR:UNE Lp 2w dig IDSL cap-Chg	nd		0.00		nd		nd		nd		abcde
4 - 432300	LEX/EDI LASR:UNE Lp 2w dig IDSL cap-Svc	0.00		0.00		0.00		0.00		0.00		cde
4 - 432500	LEX/EDI LASR:UNE 4w dig(1.544 mbps cap)-New Svc Install	0.00		0.00		0.00		0.00		0.00		a
4 - 432700	LEX/EDI LASR:UNE Lp 4w dig(1.544 mbps cap)-Svc Disconnect	88.89		58.82		100.00		54.55		100.00		a e
4 - 432813	LEX/EDI LASR:UNE EELs-Voice -New Svc Install	nd		nd		nd		nd		0.00		abcde
4 - 432814	LEX/EDI LASR:UNE Vce Grde Lp-Enhance Extend-Chg Act	nd		nd		nd		nd		0.00		abcde
4 - 432815	LEX/EDI LASR:UNE Vce Grd Lp-Enhanc Extnd-Svc Disconnects	nd		nd		0.00		0.00		nd		abcde
4 - 432817	LEX/EDI LASR:UNE EELs DS1-New Svc Install	0.00		0.00		0.00		0.00		0.00		abcde
4 - 432819	LEX/EDI LASR:UNE 4w dig DS1 Lp-Enhance Extnd-Svc Dis	100.00		100.00		nd		0.00		100.00		abcde
4 - 432841	LEX/EDI LASR:UNE 4 w dig DS1 Lp-Enhance Ext-Move Act	0.00		nd		nd		nd		nd		abcde
4 - 432900	LEX/EDI LASR:Standalone LNP-Svc Migration w/chgs	42.11		8.70		10.00		7.14		9.68		
4 - 433000	LEX/EDI LASR:LNP w/Loop-Svc Migration w/chgs	nd		18.75		41.03		33.33		20.00		a
4 - 433200	LEX/EDI LASR:UNE Platform(Loop & Prt)-Chg Activities	0.00		nd		nd		100.00		nd		abcde
4 - 433300	LEX/EDI LASR:UNE Platform(Loop & Prt)-Svc Disconnect	66.67		100.00		100.00		100.00		nd		abcde
4 - 433600	LEX/EDI LASR:High Bndwdth Line Share-New Svc Install	100.00		100.00		50.00		nd		100.00		abcde
4 - 433700	LEX/EDI LASR:High Bndwdth Line Sharing-Svc Disconnect	0.00		0.00		0.00		100.00		40.00		a cd
4 - 433800	LEX/EDI LASR:UNE 2 Wire Digital Line Sharing-Chg Act	0.00		nd		nd		nd		nd		abcde
4 - 440100	% Flo-Thru Ords EXACT:Interconnect Trks-New and Aug	nd		nd		0.00		nd		0.00		abcde
4 - 440200	% Flo-Thru Ords EXACT:Interconnect Trks-Chg Activities	0.00		0.00		nd		nd		0.00		abcde

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
4 - 440300	% Flo-Thru Ords EXACT:Interconnect Trks-Interconnect Trunks	nd		0.00		0.00		nd		nd		abcde
4 - 450101	LEX/EDI LASR:Resale Res POTS-New Svc Install	26.58		30.49		37.04		33.87		26.39		
4 - 450201	LEX/EDI LASR:Resale Res POTS-Chg Activites	75.00		83.33		100.00		100.00		25.00		abcde
4 - 450301	LEX/EDI LASR:Resale Res POTS-Move Activities	0.00		0.00		nd		0.00		0.00		abcde
4 - 450401	LEX/EDI LASR:Resale Res POTS-Svc Disconnect	100.00		100.00		98.28		98.78		97.37		
4 - 450601	LEX/EDI LASR:Resale Res POTS-Svc Migration w/chgs	100.00		nd		0.00		nd		nd		abcde
4 - 450701	LEX/EDI LASR:Resale Bus POTS-New Svc Install	0.00		0.00		0.00		0.00		nd		abcde
4 - 450801	LEX/EDI LASR:Resale Bus POTS-Chg Activities	50.00		100.00		80.00		100.00		100.00		abcde
4 - 451001	LEX/EDI LASR:Resale Bus POTS-Svc Disconnect	nd		100.00		66.67		nd		100.00		abcde
4 - 451101	LEX/EDI LASR:Resale Bus POTS-Svc Mig w/chgs as spec	0.00		0.00		nd		nd		0.00		abcde
4 - 451201	LEX/EDI LASR:Resale Bus POTS-Svc Migration w/out chgs	100.00		nd		50.00		50.00		46.67		abcd
4 - 451307	LEX/EDI CLEO:Resale Centrex-Chg Act	nd		nd		nd		0.00		0.00		abcd
4 - 451308	LEX/EDI CLEO:Resale Centrex-Move Act	nd		nd		nd		0.00		0.00		abcde
4 - 451309	LEX/EDI CLEO:Resale Centrex-Svc Disconnects	nd		nd		nd		nd		0.00		abcde
4 - 451310	LEX/EDI CLEO:Resale Centrex-Svc Mig w/chgs	nd		nd		0.00		0.00		0.00		abcd
4 - 451311	LEX/EDI CLEO:Resale Centrex-Svc Mig w/out chgs	nd		nd		nd		0.00		0.00		abcde
4 - 451316	LEX/EDI CLEO:Resale PBX-Svc Mig w/chgs	nd		0.00		nd		nd		nd		abcde
Provisioning												
5 - Percent of Orders Jeopardized												
5 - 551900	LEX/CLEO - Resale Res POTS	0.00	0.67	0.45	0.46	1.79	0.52	2.34	0.42	0.47	0.58	
5 - 552000	LEX/CLEO - Resale Bus POTS	0.00	0.98	0.00	0.56	0.00	1.25	0.00	1.21	0.00	0.74	
5 - 552200	LEX/CLEO - Resale Centrex	0.00	1.40	1.31	0.71							
5 - 552400	LEX/CLEO - Resale PBX	nd	0.00	0.00	0.00							ab
5 - 552801	LEX/CLEO - Resale Specials					1.28	0.95	5.26	0.95	1.99	0.97	
5 - 552900	LEX/EDI LASR-UNE 2/4w 8db&5.5db wt 2/4w Anal Lp FW/NFW	0.00	1.22	0.00	1.19	0.00	2.24	0.00	2.85	4.65	1.38	
5 - 553100	LEX/EDI LASR - UNE Lp 2 w Dig ISDN Cap LOF	nd	0.00	0.00	1.61	nd	3.30	nd	3.23	0.00	0.00	abcde
5 - 553300	LEX/EDI LASR- UNE Lp 2 w Dig ISDL Cap FW/NFW	0.00	0.00	0.00	1.61	0.00	3.30	0.00	3.23	0.00	0.00	abcde
5 - 553501	LEX/EDI LASR-UNE Lp 2 w Dig xDSL Cap FW/NFW	0.00		7.14		8.33		0.00		0.00		
5 - 553701	LEX/EDI LASR-UNE Lp 2 w Dig xDSL Line Share Cap-Cond FW/NFW					0.00	0.52	0.00	0.98	0.00	1.03	cde

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
5 - 553900	LEX/EDI LASR-UNE Lp 2 w Dig xDSL Lne Shar Cap-Non-Cond FW/NFW	0.00	2.71	0.00	1.02							
5 - 554100	LEX/EDI LASR-UNE Lp 4 w Dig 1.544 mbps Cap/HDSL FW/NFW	3.70	1.69	0.00	0.00	0.00	0.00	0.00	2.78	0.00	0.00	
5 - 554800	LEX/EDI LASR - UNE Ded Trnspt DS3 FW/NFW	nd	n/a	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	abcde
5 - 555201	EELs Voice Grade					nd		0.00		0.00		cde
5 - 555203	EELs DS1					0.00		0.00		0.00		cde
5 - 555300	LEX/EDI LASR - EELS DS1 - New	0.00		0.00								ab
5 - 555900	LEX/EDI LASR-UNE Pltfrm Bas Prt/8db&5.5db Lp FW/NFW	0.00	0.98	0.00	0.56	0.00	1.25	0.00	1.21	nd	0.74	abcde
5 - 556300	LEX/EDI LASR - Interconnect Trks	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	d
6 - Jeopardy Notices Returned by the Required Interval												
6 - 640000	Whlsle-Assign: Resale Res POTS	nd		nd		nd		100.00		100.00		abcde
6 - 640100	Whlsle-Assign: Resale Bus POTS	nd		100.00		nd		nd		nd		abcde
6 - 641001	Whlsle-Assign: Resale-Specials					100.00		nd		nd		cde
6 - 641600	Whlsle-Assign:UNE Lp 2 w dig xDSL Cap FW/NFW	nd		100.00		100.00		nd		nd		abcde
6 - 641800	Whlsle-Assign:UNE Lp 2/4 w 8db&5.5db wt 2/4 w Anal Cn/Anal PBX FW/NFW	nd		nd		nd		nd		100.00		abcde
6 - 644300	Whlsle-Install: Resale Res POTS	100.00		100.00		100.00		100.00		nd		abcde
6 - 644400	Whlsle-Install: Resale Bus POTS	nd		100.00		nd		nd		nd		abcde
6 - 644500	Whlsle-Install: Resale Centrex	100.00		100.00								ab
6 - 645101	Whlsle-Install: Resale Specials					nd		100.00		100.00		cde
6 - 645800	Whlsle-Install:UNE Lp 2w Dig xDSL Cap	nd		nd		100.00		nd		nd		abcde
6 - 646000	Whlsle-Install: UNE Lp 2/4 w 8db&5.5db wt 2/4 w Anal Coin/Anal PBX FW/NFW	100.00		nd		nd		nd		nd		abcde
6 - 648200	Whlsle-Install:UNE Lp 4 w Dig 1.544 mbps Cap/HDSL FW/NFW	100.00		nd		nd		nd		nd		abcde
6 - 648500	Whlsle-Miss Commit: Resale Res POTS	nd		100.00		nd		50.00		nd		abcde
6 - 650001	Whlsle-Miss Commit:UNE Lp 2w Dig IDSL Cap	nd		nd		nd		100.00		nd		abcde
6 - 650200	Whlsle-Miss Commit:UNE Lp 2/4w 8db&5.5db wt 2/4w Anal Coin/Anal PBX FW/NFW	100.00		nd		nd		nd		nd		abcde
7 - Completed Interval												
7 - 702600	Resale Res POTS fld wk	0.93	2.00	1.00	1.65	0.94	1.85	2.00	1.82	0.67	1.66	de
7 - 702700	Resale Res POTS no fld wk	0.44	0.77	0.44	0.78	0.45	0.81	0.42	0.81	0.40	0.74	

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
7 - 702800	Resale Bus POTS fld wk	1.00	1.65	0.00	1.57	nd	2.61	nd	2.03	nd	1.64	abcde
7 - 702900	Resale Bus POTS no fld wk	2.00	0.61	0.50	0.57	0.33	0.65	0.20	0.39	0.00	0.77	abcde
7 - 703200	Resale CTX fld wk	1.42	1.42	1.00	1.27							
7 - 703300	Resale CTX no fld wk	0.45	0.57	0.60	0.73							
7 - 704501	Resale Specials Field Work					1.25	2.19	1.64	3.01	0.71	2.24	c
7 - 704502	Resale Specials No Field Work					0.50	0.93	0.68	1.14	0.72	0.76	
7 - 704703	UNE loop 2/4 w Analog 8db & 5.5 loop w/out LNP	1.00	1.65	1.00	1.57	1.00	2.61	1.00	2.03	0.50	1.64	abcde
7 - 704704	UNE loop 2/4 w Analog 8db & 5.5 loop w/LNP	nd		100.00		nd		100.00		nd		abcde
7 - 704801	UNE Lp 2 w Dig ISDN Cap	nd	6.55	5.00	7.17	nd	7.60	nd	10.25	5.00	6.00	abcde
7 - 704904	UNE Lp 2 w Dig IDSL Cap	5.00	6.55	3.80	7.17	5.00	7.60	6.50	10.25	7.00	6.00	abcde
7 - 704910	UNE Lp 2 w Dig xDSL Cap - Conditioned	nd		0.00		10.00		10.00		10.00		abcde
7 - 704911	UNE Lp 2 w Dig xDSL Cap - Non-Conditioned	5.00		2.33		5.50		5.00		5.00		abcde
7 - 705001	UNE Lp 4 w Dig 1.544 mbps Cap/HDSL	6.00	11.78	6.19	10.08	5.43	11.64	5.92	13.57	7.00	14.50	a e
7 - 705707	UNE EELs DS1 - New	5.00		5.50								ab
7 - 705713	UNE EELs Voice Grade					nd		nd		10.00		cde
7 - 705714	UNE EELs DS1					7.00		7.00		7.00		cde
7 - 705800	UNE Basic Port/8dB	0.00	1.01	nd	0.92	0.00	1.30	0.00	0.81	nd	1.06	abcde
7 - 705900	Interconnect Trunks	nd	n/a	12.00	7.71	13.00	57.75	13.33	39.71	24.00	124.80	abcde
7 - 706202	UNE Lp 2 w Dig xDSL Line Share - Non-Conditioned	3.00	3.01	3.00	3.00	3.00	3.00	nd	3.04	3.00	3.00	abcde
8 - Percent Completed within Standard Interval as a Percentage On-Time												
8 - 801900	Resale CTX	100.00	97.98	100.00	98.77							
8 - 802301	Resale Specials					100.00	98.88	93.94	99.24	96.00	98.34	
8 - 802601	UNE Lp 2 w Dig ISDN Cap	nd	100.00	100.00	83.33	nd	80.00	nd	100.00	100.00	100.00	abcde
8 - 802704	UNE Lp 2 w Dig IDSL Cap	100.00	100.00	100.00	83.33	100.00	80.00	100.00	100.00	75.00	100.00	abcde
8 - 802710	UNE Lp 2 w Dig xDSL Cap - Conditioned	nd		100.00		100.00		100.00		100.00		abcde
8 - 802711	UNE Lp 2 w Dig xDSL Cap - Non-Conditioned	100.00		100.00		100.00		100.00		100.00		abcde
8 - 802800	UNE Lp 4 w Dig 1.544 mbpd cap/HDSL	100.00	100.00	100.00	96.30	100.00	100.00	100.00	92.86	100.00	93.75	a e
8 - 803407	UNE EELs DS1 - New	100.00		100.00								ab
8 - 803413	UNE EELs Voice Grade					nd		nd		100.00		cde
8 - 803414	UNE EELs DS1					100.00		100.00		100.00		cde
8 - 803600	Interconnect Trunks	nd	n/a	100.00	100.00							ab
8 - 803610	Interconnect Trunks					100.00	25.00	100.00	100.00	100.00	6.67	cde
8 - 803702	UNE Lp 2 w Dig xDSL Line Share - Non-Conditioned	100.00	99.77	100.00	99.86	100.00	100.00	nd	99.66	100.00	99.79	abcde
9 - Coordinated Customer Conversion												

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	sept.2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
9 - 910400	% On-Time:Coord Conversion Bus	100.00	85.16	100.00	88.11							
9 - 910401	% On-Time:Coord Conversion Res/Bus					100.00	85.47	100.00	86.34	66.67	76.83	
9 - 910500	% On-Time:Coord Conversion Port Out	100.00	62.50	100.00	100.00							
9 - 910501	% On-Time:Coord Conversion Port Out-bnchmrk					100.00		100.00		100.00		
9a - Frame Due Time (FDT) Conversions as a Percentage on Time												
9a - 4510200	LNP	100.00		100.00		100.00		nd		100.00		ab de
10 - LNP Network Provisioning												
10 - 1010101	Whlsle LNP Ntwk Prov Fail	0.00		0.00		0.00		0.00		0.00		
11 - Percent of Due Dates Missed												
11 - 1102600	Resale Res POTS field work	0.00	2.55	0.00	1.78	0.00	1.94	9.09	1.81	0.00	2.16	e
11 - 1102700	Resale Res POTS no field work	0.00	0.02	0.00	0.00	0.00	0.02	0.00	0.02	0.00	0.02	
11 - 1102800	Resale Bus POTS field work	0.00	1.58	0.00	2.05	0.00	1.70	0.00	2.01	nd	1.16	abcde
11 - 1102900	Resale Bus POTS no field work	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
11 - 1103200	Resale Centrex field work	2.63	1.53	0.00	0.68							
11 - 1103300	Resale Centrex no field work	0.00	0.25	0.00	0.22							
11 - 1104501	Resale Specials field work					0.00	1.15	0.00	1.00	0.00	1.57	
11 - 1104502	Resale Specials no field work					0.00	0.51	0.00	0.84	0.00	0.39	
11 - 1104701	UNE Loop 2/4 wire analog 8db & 5.5 dp Loop	3.03	1.58	0.00	2.05	0.00	1.70	0.00	2.01	0.00	1.16	
11 - 1104801	UNE Loop 2 wire Digital ISDN capable	nd	0.00	0.00	4.35	nd	2.63	nd	0.00	0.00	0.00	abcde
11 - 1104904	UNE Loop 2 wire Digital DSL capable	0.00	0.00	0.00	4.35	0.00	2.63	0.00	0.00	0.00	0.00	a cde
11 - 1104910	UNE Loop 2 wire Digital xDSL capable	0.00		0.00		0.00		0.00		0.00		
11 - 1105001	UNE Lp 4 w Dig 1.544 mbps capable/HDSL	0.00	0.00	0.00	2.86	0.00	0.00	0.00	0.00	5.88	4.55	
11 - 1105602	UNE Dedicated Trnsprt DS3 field work/no field work	nd	n/a	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	abcde
11 - 1105710	UNE EELs DS1 - New	16.67		0.00								ab
11 - 1105716	UNE EELs Voice Grade					nd		nd		0.00		cde
11 - 1105717	UNE EELs DS1					0.00		0.00		0.00		cde
11 - 1105800	UNE Basic Port/8db	0.00	0.73	nd	0.86	0.00	0.71	0.00	0.67	nd	0.48	abcde
11 - 1105900	Interconnect Trunks	0.00	80.00	0.00	0.00	0.00	75.00	0.00	0.00	0.00	93.33	cd
11 - 1106002	UNE Loop 2w dig xDSL Line Share-Non-Conditioned	0.00	0.20	0.00	0.19	0.00	0.00	nd	0.45	0.00	0.19	bcd
12 - Percent Company Missed Due Dates Due to Lack of Facilities												
12 - 1202600	Resale Res POTS fld wk	0.00	2.30	0.00	1.54	0.00	1.67	9.09	1.64	0.00	1.99	e
12 - 1202700	Resale Res POTS no fld wk	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
12 - 1202800	Resale Bus POTS fld wk	0.00	1.32	0.00	0.58	0.00	1.36	0.00	1.34	nd	0.87	abcde
12 - 1202900	Resale Bus POTS no fld wk	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

Federal Communications Commission

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Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
12 - 1203200	Resale CTX fld wk	0.00	0.92	0.00	0.34							
12 - 1203300	Resale CTX no fld wk	0.00	0.00	0.00	0.00							
12 - 1204501	Resale Specials field work					0.00	0.86	0.00	0.67	0.00	0.52	
12 - 1204502	Resale Specials no field work					0.00	0.34	0.00	0.00	0.00	0.00	
12 - 1204701	UNE Lp 2/4 w Analog 8db & 5.5 db Lp	3.03	1.32	0.00	0.58	0.00	1.36	0.00	1.34	0.00	0.87	
12 - 1204801	UNE Lp 2 w Dig ISDN Cap	nd	0.00	0.00	0.00	nd	0.00	nd	0.00	0.00	0.00	abcde
12 - 1204901	UNE Lp 2 w Dig ISDL Cap	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	a cde
12 - 1204910	UNE Lp 2 w Dig xDSL Cap	0.00		0.00		0.00		0.00		0.00		
12 - 1205001	UNE Lp 4 w Dig 1.544 mbps Cap/HDSL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.88	0.00	
12 - 1205102	UNE Ded Trnsprt DS3 fld wk/no fld wk	nd	n/a	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	abcde
12 - 1205207	UNE EELs DS1 - New	16.67		0.00								ab
12 - 1205210	UNE EELs DS1					0.00		0.00		0.00		cde
12 - 1205300	UNE Basic Port/8dB	0.00	0.61	nd	0.25	0.00	0.57	0.00	0.45	nd	0.36	abcde
12 - 1205400	Interconnect Trunks	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	cd
12 - 1205500	UNE Lp 2 w Dig ADSL Line Sharing					0.00	0.00	nd	0.00	0.00	0.06	cde
12 - 1205502	UNE Lp 2 w Dig xDSL Line Share - Non-Conditioned	0.00	0.00	0.00	0.06							b
13 - Delay Order Interval to Completion Date												
13 - 1314410	Resale Res POTS 1-30 Days					nd		7.00		nd		cde
13 - 1314413	Resale Res POTS					nd	19.68	7.00	8.74	nd	11.75	cde
13 - 1317701	UNE Lp 2/4 w Anal 8db & 5.5 db 1-30 Days	3.00	6.40	nd	6.50							ab
13 - 1318510	UNE Lp 4w Dig 1.544 mbpd cap/HDSL 1-30 Dys					nd		nd		29.00		cde
13 - 1318513	UNE Lp 4w Dig 1.544 mbpd cap/HDSL					nd	n/a	nd	n/a	29.00	n/a	cde
13 - 1318910	UNE EELs DS1 New 1-30 Days	3.00		nd								ab
14 - Held Order Interval												
14 - 1411400	Resale Res POTS	nd	99.76	28.00	97.36	58.00	112.20	nd	125.68	nd	140.58	abcde
14 - 1413307	UNE EELS - DS1 - New	nd		43.00								ab
14 - 1413500	Interconnect Trunks	nd	44.85	nd	72.67	4.00	105.83	nd	130.67	nd	151.31	abcde
15 - Provisioning Trouble Reports												
15 - 1510800	Resale OOS	0.00	0.14	0.00	0.12	0.63	0.15	0.00	0.13	0.00	0.06	
15 - 1510900	Resale Svc Affecting	0.00	0.06	0.00	0.23	0.00	0.10	0.00	0.07	0.00	0.05	
15 - 1511101	UNE Loop (excl xDSL) OOS	0.00	0.14	0.00	0.12	0.00	0.15	0.00	0.13	1.33	0.06	
15 - 1511102	UNE Loop (excl xDSL) Svc Affecting	0.00	0.06	0.00	0.23	0.00	0.10	0.00	0.07	0.00	0.05	
15 - 1511103	UNE Loop (excl xDSL) TBCC Out of Svc	nd		0.00		0.00		0.00		nd		ab e
15 - 1511104	UNE Loop (excl xDSL) FDT Svc Affecting	nd		0.00		0.00		0.00		nd		ab e

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
15 - 1511105	UNE Loop (excl xDSL) FDT OOS	0.00		0.00		0.00		nd		0.00		cde
15 - 1511106	UNE Loop (excl xDSL) FDT Svc Affecting	0.00		0.00		0.00		nd		0.00		cde
15 - 1511107	UNE Loop XDSL Cap OOS	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	
15 - 1511108	UNE Loop xDSL Cap Svc Affect	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	
15 - 1511501	Prov Trbl Rep: LNP Port Out - OOS	0.00		0.00		0.00		0.00		0.00		
15 - 1511502	Prov Trbl Rep: LNP Port Out Svc Affecting	0.00		0.00		0.00		0.00		0.00		
15a - Average Time to Restore Provisioning Troubles												
15a - 4610800	Resale OOS	nd	16.18	nd	6.57	0.82	7.44	nd	7.05	nd	8.58	abcde
15a - 4610900	Resale Svc Affect	1.28	6.51	nd	5.44	nd	4.59	nd	7.39	nd	6.59	abcde
15a - 4611000	UNE Lp (excl xDSL) OOS					nd	7.44	nd	7.05	1.17	8.58	cde
16 - Percent Troubles in 30 Days for New Orders (Specials)												
16 - 1601800	Resale Centrex	4.03	2.73	2.14	4.85							
16 - 1602410	Resale Specials					2.14	3.15	1.06	3.78	2.99	3.25	
16 - 1602701	UNE Lp 2 wire Dig ISDN cap	nd	0.00	0.00	0.00	nd	0.00	nd	0.00	100.00	0.00	abcde
16 - 1602810	UNE Lp 2 wire Dig xDSL cap	0.00		3.13		17.24		5.41		3.92		
16 - 1602900	UNE Lp 4 wire Dig 1.544 mbpd cap/HDSL	0.00	2.44	3.70	2.38	3.57	10.53	7.41	0.00	5.88	4.00	
16 - 1603502	UNE Ded Transport - DS3	nd	n/a	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	abcde
16 - 1603506	UNE EELs DS1 - New	nd		nd		nd		nd		0.00		abcde
16 - 1603508	UNE EELs DS3 - New	0.00		0.00		0.00		0.00		0.00		abcde
16 - 1604200	Interconnection Trunks	0.00	190.00	0.00	75.00	0.00	225.00	0.00	600.00	0.00	20.00	cd
16 - 1605200	UNE Lp 2 w Dig xDSL Line Sharing	0.00	1.76	0.00	1.91	0.00	1.58	100.00	3.22	0.00	2.72	bcde
17 - Percent Troubles in 10 Calendar Days for New Orders (Non-Specials)												
17 - 1710700	Resale Res POTS	0.60	2.51	2.78	1.94	2.42	1.83	1.22	2.19	1.45	1.99	
17 - 1710800	Resale Bus POTS	0.00	2.47	9.68	2.40	3.57	1.86	5.88	1.24	0.00	0.99	
17 - 1711100	UNE Lp 2/4 w Anal 8db & 5.5db Lp	0.00	4.52	9.30	5.23	0.00	2.73	0.00	3.00	0.00	0.87	
17 - 1711400	UNE Lp 2/4 w Anal 8db&5.5db Lp TBCC	nd		0.00		0.00		0.00		0.00		ab e
17 - 1711600	UNE Platform-Basic Port & Loop	0.00	2.47	0.00	2.40	0.00	1.86	0.00	1.24	nd	0.99	abcde
17 - 1711700	LNP	0.00		0.00		0.00		0.00		0.00		
18 - Average Completion Notice Interval												
18 - 1800101	Fully Electronic-LEX/EDI LASR	100.00		100.00		99.34		100.00		99.79		
18 - 1800401	Fully Elec Fallout - LEX/EDI LASR (% w/in 24 hrs)	100.00		100.00		100.00		100.00		100.00		abcd
18 - 1800502	Fallout Level- LEX/EDI LASR	1.65										
18 - 1800900	ALL Other Int- Manual Fax	99.46		99.47								
18 - 1800901	ALL Other Int- Manual Fax					97.91		99.66		98.38		

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Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
18 - 1801000	All Other Int- EXACT (% w/in 24 hrs)	100.00		100.00								
18 - 1801001	All Other Int- EXACT (% w/in 24 hrs)					100.00		100.00		100.00		de
Maintenance												
19 - Customer Trouble Report Rate												
19 - 1991600	Stwde Resale Res POTS	0.23	0.60	0.61	0.73	0.79	0.70	0.55	1.12	0.74	0.67	
19 - 1991700	Stwde Resale Bus POTS	2.55	0.35	0.25	0.36	0.52	0.43	0.72	0.49	0.24	0.39	
19 - 1991900	Stwde Resale Centrex	0.09	0.23	0.29	0.32							
19 - 1992410	Stwde Resale Specials					0.29	0.36	0.20	0.50	0.20	0.32	
19 - 1992603	Stwde UNE Loop 2/4 wire 8db & 5.5db loop	0.18	0.33	0.36	0.34	0.08	0.41	0.25	0.46	0.12	0.35	
19 - 1992703	Stwde UNE Loop 2 wire Digital ISDN capable	0.00	3.44	0.00	3.77	0.00	3.80	0.00	3.81	0.68	5.08	
19 - 1992802	Stwde UNE Loop 2 wire Dig xDSL cap - Non-Std	0.00		0.00		0.00		0.00		0.00		abcde
19 - 1992804	Stwde UNE Loop 2 wire Digital xDSL capable	0.23		0.23		1.39		0.58		0.34		
19 - 1992904	Stwde UNE Loop DS3	0.00	n/a	100.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	abcde
19 - 1992910	Stwde UNE Loop 4 wire Digital 1.544 mbpd	0.86	1.04	1.72	1.98	1.30	1.81	1.90	2.10	2.07	1.68	
19 - 1993501	Stwde UNE Dedicated Transport - DS1	0.00	1.04	6.25	1.98	0.00	1.81	0.00	2.42	0.00	1.68	
19 - 1993502	Stwde UNE Dedicated Transport - DS3	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	0.00	n/a	abcde
19 - 1993504	Stwde UNE Dark Fiber	0.00		0.00		0.00		0.00		0.00		abcde
19 - 1993505	Stwde UNE EELs - Voice Grade	0.00		0.00		0.00		0.00		1.61		
19 - 1993506	Stwde UNE EELs - DS1	1.33		1.30		2.50		0.00		1.23		
19 - 1993600	Stwde Platform - Basic Port & Loop	0.00	0.35	0.00	0.36	0.00	0.43	5.26	0.49	0.00	0.39	
19 - 1993700	Stwde Interconnection Trunks	0.00	0.09	0.01	0.05	0.00	0.06	0.00	0.08	0.00	0.06	
19 - 1993801	Stwde LNP (Port Out)	0.00		0.00		0.00		0.00		0.00		
19 - 1993900	Stwde NXX Code Openings	0.00	0.00	0.00	0.00							
19 - 1993910	Stwde NXX Code Openings					0.00		0.00		0.00		
19 - 1994200	Stwde UNE Loop 2 wire Digital xDSL Line Sharing	0.00	0.45	0.00	0.46	0.00	0.50	1.18	0.66	0.00	0.50	
20 - Percent of Customer Trouble not Resolved within Estimated Time												
20 - 2093100	Stwde Resale Res POTS dispatched	0.00	6.06	0.00	5.12	0.00	4.56	0.00	7.37	0.00	5.38	ab de
20 - 2093200	Stwde Resale Res POTS not disp	0.00	0.00	0.00	1.41	nd	0.00	0.00	3.13	0.00	1.56	abcde
20 - 2093300	Stwde Resale Bus POTS dispatched	37.50	9.15	0.00	2.67	0.00	10.11	0.00	12.75	0.00	4.46	abcde
20 - 2093400	Stwde Resale Bus POTS not disp	0.00	33.33	nd	0.00	nd	0.00	nd	0.00	nd	14.29	abcde
20 - 2093700	Stwde Resale Centrex dispatched	0.00	5.32	0.00	4.69							a
20 - 2093800	Stwde Resale Centrex not dispatched	nd	0.00	0.00	0.00							ab
20 - 2094810	Stwde Resale Specials dispatched					0.00	13.38	0.00	16.67	6.67	19.69	
20 - 2094811	Stwde Resale Specials not disp					0.00	18.18	nd	19.35	nd	9.68	cde

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
20 - 2095201	Ste UNE Lp 5.5db 2/4 w anlg assrd nt disp	10.00	9.59	10.53	2.03	0.00	9.50	8.33	11.62	0.00	2.65	c e
20 - 2095401	Stwde UNE Lp 2 wire Dig ISDN cap	nd	81.82	nd	75.00	nd	25.00	nd	50.00	0.00	56.25	abcde
20 - 2095605	Stwde UNE Loop 2 wire Dig xDSL	0.00	11.11	0.00	8.06	0.00	5.48	0.00	11.11	0.00	12.20	ab de
20 - 2095803	Stwde UNE Loop DS3	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	nd	n/a	abcde
20 - 2095811	Stwde UNE Lp 4 w Dig 1.544 mbpd cap/HDSL	100.00	46.15	50.00	48.00	66.67	34.78	55.56	38.46	40.00	38.10	abcd
20 - 2097001	Stwde UNE Dedicated Transport-DS1	nd	46.15	100.00	48.00	nd	34.78	nd	33.33	nd	38.10	abcde
20 - 2097005	Stwde UNE EELsVoice Grade	nd		nd		nd		nd		100.00		abcde
20 - 2097006	Stwde UNE EELs DS1	100.00		0.00		100.00		nd		0.00		abcde
20 - 2097201	Ste UNE Pltform Bas Pt & 8db & 5.5db Lp	nd	9.62	nd	2.53	nd	9.63	50.00	12.32	nd	4.88	abcde
20 - 2097300	Stwde Interconnect Trunks	nd	19.35	100.00	5.88	nd	21.74	nd	12.90	nd	36.36	abcde
20 - 2098001	Ste UNE Lp 2 w Dig xDSL Lne Shar disp	nd	11.11	nd	8.06	nd	5.48	0.00	11.11	nd	12.20	abcde
21 - Average Time to Restore												
21 - 2192900	Stwde Resale Res POTS disptchd	2.03	11.89	7.77	10.98	7.31	12.77	18.89	16.23	2.62	12.59	ab de
21 - 2193000	Stwde Resale Res POTS not disptchd	0.20	3.43	0.03	3.68	nd	4.92	0.15	9.40	0.15	4.97	abcde
21 - 2193100	Stwde Resale Bus POTS disptchd	6.25	7.75	1.10	5.65	3.20	7.86	1.97	8.55	3.57	7.74	abcde
21 - 2193200	Stwde Resale Bus POTS not disptchd	0.08	11.69	nd	0.32	nd	3.65	nd	1.76	nd	3.37	abcde
21 - 2193500	Stwde Resale CTX disptchd	15.16	5.65	4.04	8.45							a
21 - 2193600	Stwde Resale CTX not disptchd	nd	0.89	0.96	14.28							ab
21 - 2194810	Stwde Resale Specials dispatched					1.90	10.65	4.13	7.75	10.84	8.55	
21 - 2194811	Stwde Resale Specials not dispatched					2.83	2.93	nd	3.58	nd	2.43	cde
21 - 2195401	Stwde UNE 2/4 w 8db & 5.5 db Loop	12.83	7.64	4.85	5.29	2.13	7.84	4.18	8.48	1.73	7.38	a c e
21 - 2195601	Stwde UNE Lp 2 w Dig ISDN capable	nd	7.77	nd	9.05	nd	7.77	nd	4.61	2.83	4.80	abcde
21 - 2195805	Stwde UNE Lp 2 w Dig xDSL cap	1.93	7.60	3.57	8.57	6.09	7.94	4.69	12.12	2.05	11.68	abcde
21 - 2196001	Stwde UNE Lp 4 w Dig 1.544 mbpd cap/HDSL	7.70	6.49	4.52	4.98	6.95	5.19	9.05	3.78	4.02	3.56	abcd
21 - 2196003	Stwde UNE Lp DS3	nd	n/a	2.33	n/a	nd	n/a	nd	n/a	nd	n/a	abcde
21 - 2197201	Stwde UNE Ded Transpt DS1	nd	6.49	15.32	4.98	nd	5.19	nd	3.65	nd	3.56	abcde
21 - 2197205	Stwde UNE EELS Voice Grade	nd		nd		nd		nd		23.47		abcde
21 - 2197206	Stwde UNE DS1	9.22		1.07		7.58		nd		3.65		abcde
21 - 2197401	Stwde UNE Pltform Basic Port & 8db & 5.5 db Lp	nd	7.83	nd	5.35	nd	7.63	30.45	8.30	nd	7.56	abcde
21 - 2197500	Stwde Interconnect Trunks	nd	24.38	88.98	8.46	nd	19.64	nd	8.28	nd	10.90	abcde
21 - 2197601	Stwde LNP (Port Out)	nd		nd		nd		5.22		nd		abcde
21 - 2198404	Stwde UNE Line Sharing Lp 2 w Dig xDSL	nd	7.60	nd	8.57	nd	7.94	3.02	12.12	nd	11.68	abcde
22 - POTS Out of Service Less Than 24 Hours												
22 - 2290300	Stwde Resale Bus POTS	100.00	92.86	100.00	100.00	100.00	92.93	100.00	90.00	nd	95.56	abcde

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		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
22 - 2290400	Stwide Resale Res POTS	100.00	94.47	100.00	95.81	100.00	92.52	83.33	78.62	100.00	92.94	abcde
22 - 2290501	Stwide UNE Lp 2/4 wire anal 8db & 5.5db Lp	50.00	92.31	100.00	100.00	100.00	92.78	100.00	90.09	100.00	95.35	abcde
23 - Frequency of Repeat Troubles in 30-Day Period												
23 - 2391600	Statewide Resale Res POTS	0.00	7.96	0.00	8.88	0.00	9.30	0.00	6.86	0.00	9.64	ab d
23 - 2391700	Statewide Resale Bus POTS	0.00	5.13	0.00	6.33	0.00	5.88	0.00	7.04	0.00	7.23	abcde
23 - 2391900	Statewide Resale CTX	12.50	1.96	12.00	5.59							a
23 - 2392410	Statewide Resale Specials					0.00	10.73	22.22	10.53	5.88	12.66	
23 - 2392601	Statewide UNE Loop 2/4 wire 8db & 5db Lp	10.00	5.48	0.00	6.08	25.00	5.59	7.69	7.50	0.00	6.54	c e
23 - 2392701	Statewide UNE Lp 2 wire Digital ISDN Cap	nd	18.18	nd	58.33	nd	33.33	nd	33.33	0.00	37.50	abcde
23 - 2392805	Statewide UNE Loop 2 w Dig xDSL cap	50.00		0.00		8.33		0.00		33.33		ab de
23 - 2392901	Statewide UNE Loop 4 wire Digital 1.544 mbpd	75.00	23.08	0.00	28.00	16.67	26.09	11.11	23.08	10.00	28.57	abcd
23 - 2392902	Statewide UNE Loop DS3	nd	n/a	0.00	n/a	nd	n/a	nd	n/a	nd	n/a	abcde
23 - 2393501	Statewide UNE Ded Trnsprt - DS1	nd	23.08	0.00	28.00	nd	26.09	nd	23.33	nd	28.57	abcde
23 - 2393505	Statewide UNE EELS - Voice Grade	nd		nd		nd		nd		0.00		abcde
23 - 2393506	Statewide UNE EELS - DS1	0.00		0.00		0.00		nd		0.00		abcde
23 - 2393600	Statewide UNE Platform-Basic Port & Loop	nd	5.13	nd	6.33	nd	5.88	50.00	7.04	nd	7.23	abcde
23 - 2393700	Statewide Int Cnct Trnks	nd	12.90	0.00	35.29	nd	17.39	nd	19.35	nd	8.70	abcde
23 - 2394100	Statewide UNE Lp 2 wire Dig xDSL Line Sharing	nd	3.70	nd	3.17	nd	6.85	0.00	10.00	nd	12.20	abcde
Network Performance												
24 - Percent Blocking on Common Trunks												
24 - 2400100	Common Trunks	5.13		5.71		0.00		5.56		3.23		
26 - NXX Loaded by LERG Effective Date												
26 - 2600200	Whlsle	nd	n/a	nd	n/a	100.00	n/a	nd	n/a	nd	n/a	ab de
Billing												
28 - Usage Timeliness												
28 - 2800200	Resale	1.19	2.38	1.21	2.25	1.13	2.43	1.18	2.61	0.98	2.30	
28 - 2800300	Unbundled	1.39	2.38	1.34	2.25	1.25	2.43	1.52	2.61	1.28	2.30	
28 - 2800500	Meet Pt	0.99	2.38	0.90	2.25	0.89	2.43	0.94	2.61	0.53	2.30	
30 - Wholesale Bill Timeliness												
30 - 3000100	Resale	nd		nd		100.00		100.00		100.00		abcde
30 - 3000200	Unbundled	100.00		100.00		100.00		100.00		100.00		
30 - 3000300	Fac/Int Cnct	100.00		100.00		100.00		100.00		100.00		
31 - Usage Completeness												
31 - 3100200	Resale	99.90	99.81	99.87	99.83	99.98	98.97	100.00	99.81	99.82	99.73	

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
31 - 3100300	Unbundled	99.19	99.81	99.41	99.83	99.94	98.97	100.00	99.81	98.96	99.73	
31 - 3100400	Fac/Int Cnct	100.00		100.00		100.00		100.00		100.00		
32 - Recurring Charge Completeness												
32 - 3200200	Resale	92.56	95.42	96.72	95.34	96.12	93.56	95.40	96.87	99.07	97.68	
32 - 3200300	UNE POTS	100.00	95.42	100.00	95.34	100.00	93.56	53.85	96.87	100.00	97.68	c e
32 - 3200400	UNE Other	97.39		96.54		99.21		98.92		100.00		
32 - 3200500	Fac/Int Cnct	100.00		100.00		100.00		100.00		100.00		
33 - Non-Recurring Charge Completeness												
33 - 3300200	Resale	96.54	87.54	97.22	84.62	99.21	87.53	94.92	86.22	98.76	83.38	
33 - 3300300	UNE POTS	100.00	87.54	100.00	84.62	100.00	87.53	60.00	86.22	100.00	83.38	c e
33 - 3300400	UNE Other	97.30		97.67		98.79		98.97		100.00		
34 - Bill Accuracy												
34 - 3400401	Resale Usage	100.00	99.89	100.00	99.89	100.00	99.90	100.00	99.91	99.42	99.89	
34 - 3400501	Resale Recurring	99.94	99.94	100.00	99.93	99.94	99.93	100.00	99.94	99.95	99.93	
34 - 3400601	Resale Non-Recurring	100.00	99.80	100.00	99.82	100.00	99.74	100.00	99.85	100.00	99.84	
34 - 3400701	UNE POTS Usage	100.00	99.89	100.00	99.89	100.00	99.90	100.00	99.91	100.00	99.89	
34 - 3400801	UNE POTS Recurring	100.00	99.94	100.00	99.93	100.00	99.93	100.00	99.94	100.00	99.93	
34 - 3400901	UNE POTS Non-Recurring	100.00	99.80	100.00	99.82	100.00	99.74	100.00	99.85	100.00	99.84	
34 - 3401001	UNE Other Usage	100.00		100.00		100.00		100.00		100.00		
34 - 3401101	UNE Other Recurring	100.00		99.28		98.56		100.00		100.00		
34 - 3401201	UNE Other Non-Recurring	100.00		100.00		99.28		100.00		100.00		
34 - 3401301	Fac/Interconnect Usage	98.41		100.00		98.55		100.00		99.96		
34 - 3401401	Fac/Interconnect Recurring	100.00		100.00		100.00		100.00		100.00		
34 - 3401501	Fac/Interconnect Non-Recurring	100.00		100.00		100.00		100.00		100.00		
35 - Billing Completion Notice Interval												
35 - 3500100	Local Wholesale	96.40		96.74		96.04		95.42				
35 - 3500300	LASR/WFM									96.56		
Database Updates												
37 - Database Update Interval												
37 - 3700200	Loc Whlse Prod-Svc Ord Gen UpDts	3.08	4.66	2.16	4.52	3.39	4.98	2.38	4.74	1.81	4.46	
37 - 3700250	Loc Whlse Prod-Svc Ord Gen UpDts to LIDB	0.06	0.16	0.04	0.11	0.04	0.15	0.06	0.12	0.05	0.09	
37 - 3700300	Loc Whlse Prod Direct Gtwy UpDts	100.00		100.00		100.00		100.00		100.00		
38 - Percent Database Accuracy												

Nevada Performance Metric Data

Metric Number	Metric Name and Disaggregation	Sept. 2002		Oct. 2002		Nov. 2002		Dec. 2002		Jan. 2003		Notes
		CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	CLEC Result	N*B	
38 - 3800200	Loc Whlsle Prod- Svc Ord Gen UpDts	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	
38 - 3800500	Loc Whlsle Prod- Svc Ord Gen UpDts	98.61	94.19	93.77	92.87	97.58	94.09	99.22	94.87	98.81	94.65	
38 - 3800700	Loc Whlsle Prod- Ord Gen LIDB Updts	96.44	99.51	99.56	99.52	98.52	99.38	98.09	99.63	98.61	99.53	
39 - E911/911 MS Database Update Interval												
39 - 3900200	Loc Whlsle Prod- Svc Ord Gen UpDts	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	
Collocation												
40 - Time to Respond to a Collocation Request												
40 - 4000300	Spce Avail & Prc & Sched Quote-ICB-10 dys					100.001		nd		nd		cde
Interfaces												
42 - Percent of Time Interface is Available												
42 - 4200700	Wholesale Datagate	99.99		99.87		99.80		99.93		100.00		
42 - 4200800	Wholesale WEBVERIGATE	99.98		99.88		99.72		99.89		99.93		
42 - 4200900	Wholesale WEBTOOLBAR	99.79		98.36		99.88		100.00		99.36		
42 - 4201000	Wholesale WEBLEX	99.98		99.69		100.00		99.96		99.55		
42 - 4201300	Wholesale EDI/Ordering	100.00		100.00		100.00		100.00		100.00		
42 - 4201400	Wholesale PRAF	100.00		100.00		100.00		100.00		97.08		
42 - 4201500	Wholesale SORD	99.42	99.42	99.61	99.61	100.00	100.00	99.98	99.98	99.77	99.77	
42 - 4201700	Wholesale EDS TELIS/EXACT	100.00		100.00		100.00		100.00		100.00		
42 - 4201800	EBTA GUI	99.44		99.99		99.97		99.98		100.00		
42 - 4201900	EDI/CORBA/Pre-Order	99.98		99.86		99.84		99.94		99.99		
42 - 4202000	NDM/EXACT	100.00		100.00		100.00		100.00		100.00		
42 - 4202100	TBTA	100.00		100.00		100.00		100.00		100.00		
42 - 4202200	EBTA	98.66		99.77		99.85		99.97		100.00		
44 - Center Resoonsiveness												
44 - 4400200	Rpr Ctr Local Wlsle Prod	6.43	12.071	3.99	11.92	6.271	13.851	3.981	17.221	4.40	10.881	
44 - 4400300	Ord Ctr Local Wlsle Prod	5.92		6.41		6.861		5.331		5.711		

Abbreviations: n/a - not available.
nd - denotes 'no data' or no CLEC requests
to measure.

Blank space means data are not available.

Notes: a - for September, CLEC sample size was less than 10.
b - for October, CLEC sample size was less than 10.
c - for November, CLEC sample size was less than 10.
d - for December, CLEC sample size was less than 10.
e - for January, CLEC sample size was less than 10.